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Certified Number: 7007 0710 0005 3965 8828

May 2, 2008

City of Indianapolis
DPW
Department of Public Works

Denise Curtis
National Starch and Chemical Company
1515 South Drover Street
Indianapolis, IN 46221

Re: Annual Facility Inspection
Permit T097-7714-00042, 097-20891-00042, and 097-24287-00042

Dear Ms Curtis:

On April 11, 22 and 25, 2008 a representative of the Office of Environmental Services conducted inspections to determine compliance with Indianapolis and Indiana air pollution control rules. For your information, a summary of the inspection report is provided below:

Company Name: National Starch and Chemical Company
Company Address: 1515 South Drover Street

Type of Inspection:
- [X] EPA Commitment
- [ ] Complaint
- [ ] Surveillance
- [X] Routine
- [ ] Other: _____

Results of Inspection:
- [ ] No violations observed at the time of the inspection
- [ ] Further inspection necessary
- [ ] Further investigation, review of records, or laboratory analysis of samples necessary to determine compliance
- [X] Out of compliance with the following rules: D.2.6 (b), D.2.7(a), (b) & (c), D.2.10 (b)& (c); Permit 097-24287-00042

Recommended Action:
- [ ] None
- [X] Pursue local enforcement action
- [ ] Refer to IDEM Office of Air Management for enforcement action
- [ ] Other: _____

Inspector Information: Derek R. Eisman Telephone: (317) 327-2240

Derek R Eisman

Timothy J. Method
Environmental Coordinator

Derek R. Eisman
Senior Project Manager, Air Compliance

cc: Cheryl Carlson, Enforcement Program Manager
Lynne Sullivan, Office of Enforcement, Indiana Department of Environmental Management
Matt Mosier, Program Manager

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

OFFICE OF ENVIRONMENTAL SERVICES **Final Report**
ANNUAL SOURCE REPORT (ASR)
This ASR covers the period from May 18, 2007 to April 25, 2008

SOURCE: National Starch & Chemical Co.

LOCATION: 1515 S. Drover St.

PLANT ID NUMBER: 00042
INSPECTED BY: Derek Eisman
INSPECTION DATE: 04/11/07
TIME IN: 11:08 **TIME OUT:** 14:45
INSPECTION DATE pt2: 04/21/07
TIME IN: 13:00 **TIME OUT:** 16:17
INSPECTION DATE pt3: 04/25/08
TIME IN: 13:45 **TIME OUT:** 15:00
REPORTED BY: Derek Eisman
REPORT DATE: 05/16/08
REVIEWED BY: Matt Mosier
COUNTY: Marion

CITY: Indianapolis

COMPLAINT INVESTIGATION: ___ Yes, ✓ No **COMPLAINT NUMBER:** NA

PERMIT TYPE: Title V

PERMIT NO: T097-7714-00042, T097-20891-00042, T097-24287-00042

CHECK IF APPLICABLE: ____NSPS, ____NESHAP, ____PSD, ____OTHER (explain)

SOURCE STATUS: The Source is located in Marion County, which is non-attainment for $PM_{2.5}$ and attainment for all other criteria pollutants (Ozone, SO_2, NOx, PM_{10}, CO, & Lead).

PERSONS/TITLE INTERVIEWED: Greg Hurst, Security, Safety, Health and Environmental Manager
Jeff King, Co-Products Department Head
Roger Graves, Department Manager, Specialties
Denise Curtis, Senior Project Manager

OBJECTIVES:

✓ **Compliance Monitoring Strategy**	✓ **Commitment**
✓ **Full Compliance Evaluation (FCE)**	___ **Multimedia Screening**
___ **Partial Compliance Evaluation (PCE)**	___ **Surveillance**
___ **Complaint**	✓ **Other:** Co-inspection

Were all relevant documents reviewed prior to the inspection: ✓ **Yes,** ___ **No. If no, explain**

DESCRIPTION OF SOURCE: National Starch & Chemical primarily engages in milling corn or sorghum grain by wet process, and producing starch, syrup, oil sugar, feed, heavy steepwater, and by-products such as gluten meal and germ meal.

BACKGROUND: The previous inspection conducted on National Starch and Chemical Company was on May 18, 2007 and violations were discovered regarding missing visible emission and pressure drop notations and pressure drop reading exceedances without a compliance response. These were resolved with a Compliance Agreement (CA) signed on January 18, 2008 and a fine of $34,000 paid. See attached CA for details.

- There were no complaints regarding this Source reported to OES in the previous five (5) years.
- There were no emergencies reported to OES from May 18, 2007 to April 25, 2008.
- There were numerous violations noted in the past five (5) years.
  In 2003, two (2) violations concerning the lack of pressure drop records were discovered during the 05/22/03 annual inspection and National Starch was issued an NOV on August 13, 2003. This issue was resolved through a Compliance Agreement on November 17, 2003.
  In 2005, eleven thousand and twenty-seven (1127) violations were discovered during the inspection conducted on January 24, 2005 where the Source failed to maintain proper pressure drop and visible emission records on several emitting units. These 2005 violations were resolved with the Compliance

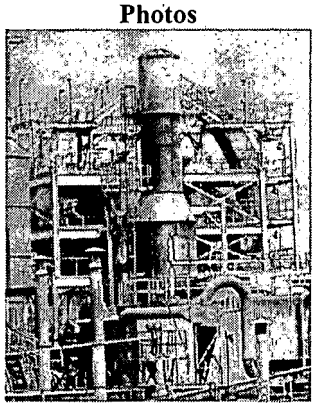
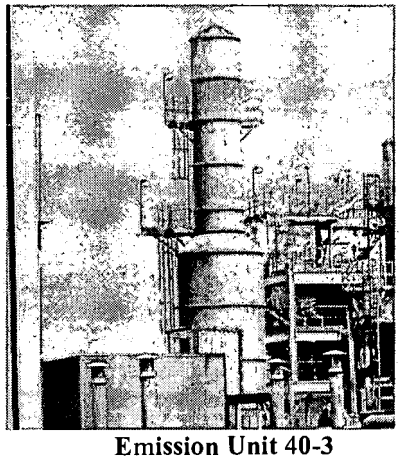
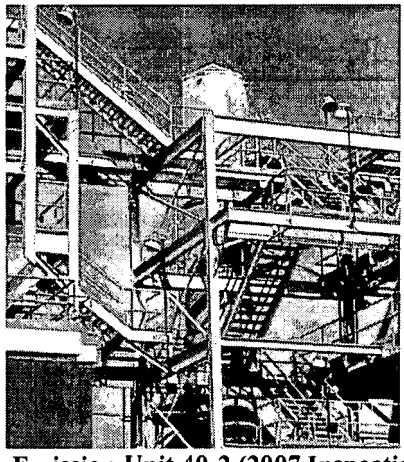
Agreement signed on January 18, 2008. Also in 2005, the 2004 Annual Compliance Certification was late and this violation was resolved with a violation letter sent on May 16, 2005.
In 2006, several parametric monitoring violations were discovered and are were resolved with the Compliance Agreement signed on January 18, 2008.
In 2007, no violations were discovered.

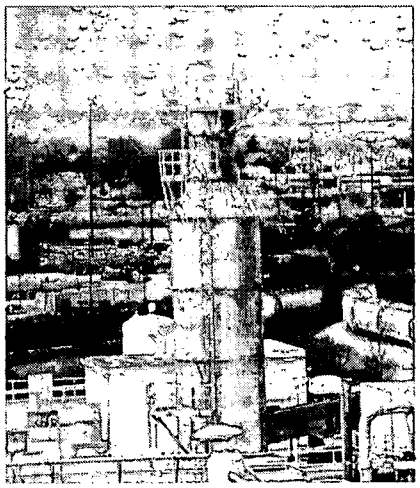
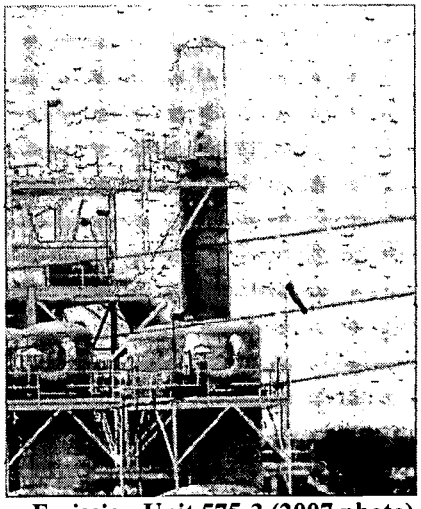
- There have been two (2) Compliance Agreements (CAs) concerning this Source in the last five (5) years. The first CA involved a failure to keep pressure drop records discovered during the May 22, 2003 inspection. This agreement was finalized on November 17, 2003 and resulted in a penalty which has been paid. The second CA involved missing visible emission and pressure drop notations and pressure drop reading exceedances without a compliance response. This was finalized on January 18, 2008 and a fine of $34,000 was paid.
- There have been two (2) Supplemental Environmental Projects (SEPs) concerning National Starch & Chemical in the past five (5) years. The first SEP related to violating the opacity limit on three (3) occasions and required the installation of a particulate control system to control fugitive emissions from the By-Products Truck Loading facility. The second SEP involved a failure to pass a stack test on the Gluten Flash Dryer (EU5502-1C)(EU stands for emitting unit) and required National Starch to construct pavement or other impermeable surface around the Co-Products Building to reduce the amount of landfill waste generated by the occasional spillage of corn product onto existing limestone. These supplemental environmental projects were verified as being completed during subsequent annual inspections of the facility.
- The Source's Title V permit will expire on April 13, 2009. The Source will need to submit a permit renewal application on July 13, 2008. This will keep them compliant with permit condition B.17(b)(1) Permit Renewal which states "A timely permit renewal application is one that is submitted at least nine (9) months prior to the permit expiration date."
- The Source was issued an initial Title V permit, T097-7714-00042, on April 14, 2004. The First Significant Permit Modification, 097-20891-00042, which addressed changes requested by the Source to the Title V permit, was issued on December 8, 2006. An application was received on February 6, 2007, requesting to combine Truck Loadout (unit 5503-6) and Hammer Mill (unit 5502-3) into one emission point and remove monitoring and recordkeeping requirements and correct some typographical errors. This significant permit modification was issued as SPM 097-24287-00042 on August 23, 2007. There is a draft permit, SPM 097-23497-00042 that is to combine 5502-4 into the Feed Dust Collector, 5502-3 and establish a VOC limit for the processes exhausting into the existing Regenerative Thermal Oxidizer (RTO).

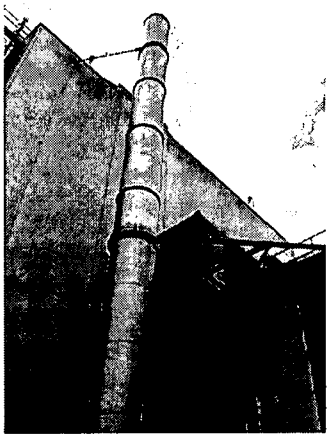
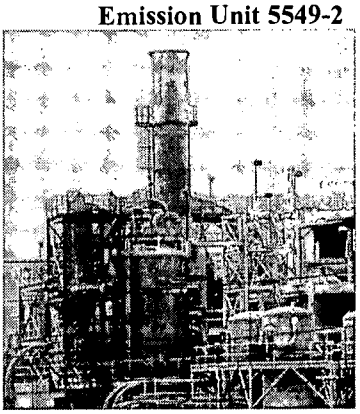
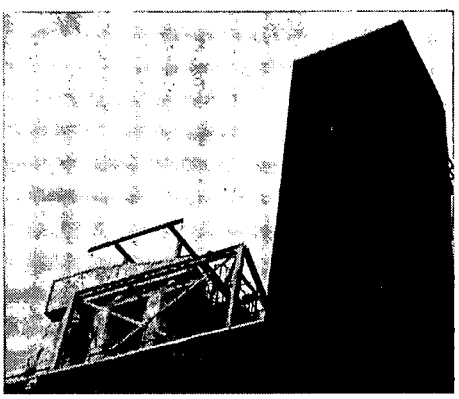
PROCESS DESCRIPTION/FINDINGS/OBSERVATIONS:

Permit Number(s): T097-7714-00042, T097-20891-00042, T097-24287-00042
General Description: Various drying process for different starch products.

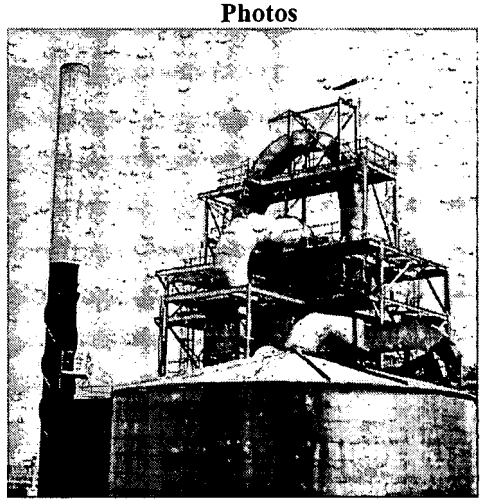
D.1 1. Process Description/
2. Equipment and Observations:

EU Description	Observations	Photos
(a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, constructed in 1965 and modified in 1994, with a maximum heat input capacity of 30 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-4.	*This unit and its wet scrubber were operating on 04/11/08. There were no observable visible emissions (VEs), the pressure drop was 6.0 inches of water (" of water) and the scrubber make-up water flow rate was 13 gallons per minute (gpm). The permitted pressure drop range is 3-8 so this unit was in compliance.*	 Emission Unit 40-4
(b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, constructed in 1967 and modified in 1994 and 1999, with a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-3.	**Emission Unit 40-4** *This unit and its wet scrubber were operating on 04/11/08. There were no observable VEs, the pressure drop was 9.0" of water and the scrubber make-up water flow rate was 10.29 gpm. The permitted pressure drop range is 6-15 so this unit was in compliance.*	 Emission Unit 40-3
(c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, constructed in 1971, with a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-2.	*This unit and its wet scrubber were operating on 04/11/08. There were no observable VEs, the pressure drop was 6.0" of water and the scrubber make-up water flow rate was 20 gpm. The permitted pressure drop range is 3-8 so this unit was in compliance.*  Emission Unit 40-2 (2008 Inspection)	 Emission Unit 40-2 (2007 Inspection)

EU Description	Observations	Photos
(d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, constructed in 1977, with a maximum heat input capacity of 43 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-1	*This unit was operating on 04/11/08 with no observable VEs and a pressure drop of 10.0" of water which is compliant with the permitted range of 6-15" of water. The scrubber recirculation rate was 14.8 gpm.*	 **Emission Unit 575-1**
(e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, constructed in 1993, with a maximum heat input capacity of 40 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-3.	*Not in operation on 04/11/08.*	 **Emission Unit 575-3 (2007 photo)**
(f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, constructed in 1993 modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-1.	*Not in operation on 04/11/08.*	 **Emission Unit 5549-1**

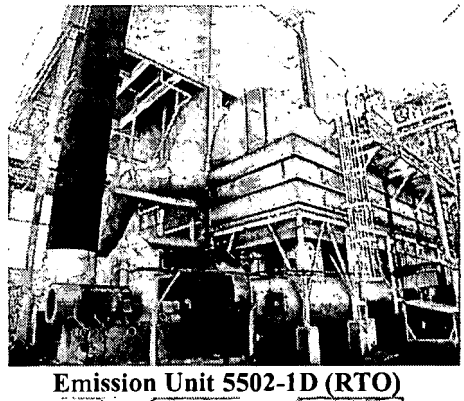
EU Description	Observations	Photos
(g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, constructed in 1993 modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-2	*This unit was operating on 04/11/08 with a pressure drop of 8.0" of water which is compliant with the permitted range of 6-15" of water. The scrubber recirculation rate was 24.0 gpm*	 Emission Unit 5549-2
(h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, constructed in 1979 and replaced in 1995, with a maximum heat input capacity of 38 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-2	**Emission Unit 5549-2** *This unit was operating on 04/11/08 with a pressure drop of 8.0" of water which is compliant with the permitted range of 6-15" of water. The scrubber recirculation rate was 15.1 gpm.*	 Emission Unit 575-2 (2007 photo)
(i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, constructed in 1997, a maximum heat input capacity of 77 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.	**Emission Unit 575-2** *The Feed Dryer, EU 5502-1A was in operation on 04/11/08 and VE notations are not required as this unit exhausts into the RTO, EU 5502-1D.*	 Emission unit 5502-1A
	Emission unit 5502-1A	

EU Description	Observations	Photos
(j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, constructed in 1997, a maximum heat input capacity of 20 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.	*This Germ dryer unit, EU 5502-1B and the Gluten Dryer, EU5502-1C were operating on 04/11/08. VE notations are not required as these units exhaust into the RTO (EU 5502-1D).*	
(k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, constructed in 1997, a maximum heat input capacity of 32 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D	*The first effect wash system was operating at a flow rate of 717 gpm with a pH of 8.3. This is in compliance as this pH should be ≥ 6.5 as per D.1.9(a).*	

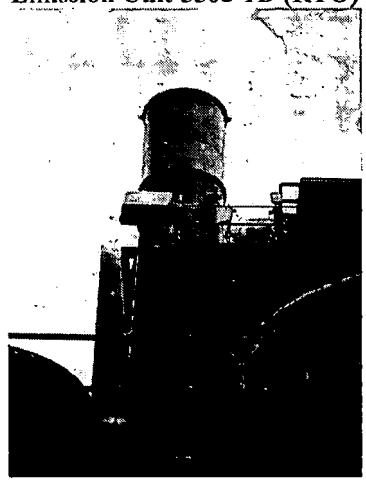


Stack 5502-7 or RTO Stack, L; Emission Unit 5502-1C, R

(l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate and opacity control, and exhausting to stack 5502-7	*The Regenerative Thermal Oxidizer (RTO) was operating during the 04/11/08 inspection. The 3 hour average temperature of 1497°F was ≥ 1400°F as required by D.1.9(d). There were no observable VEs from stack 5502-7.*	
(m) Spray Agglomerator #3, identified as unit 5549-28, part of the agglomerator process listed in Section D.2, a maximum capacity of 25.0 MMBtu/hr with emissions controlled by a wet scrubber, and exhausting to stack 5549-28.	*This unit was operating during the inspection on 04/11/08. There were no observable VEs and the pressure drop was 7.88" of water which is compliant with the permitted range of 6-15" of water. This EU is also known as the #3 Spray Dryer at Building 858.*	



Emission Unit 5502-1D (RTO)



Emission Unit 5549-28 **Emission Unit 5549-28**

3. **Pollutants Emitted:** ___SO_2, ___NOx, ✓ PM, ✓ PM_{10}, ___CO, ✓ VOC, ___HAPs

4. **Control Equipment:**

Control Equipment/Identification	Exhaust to:
Wet scrubbers	Ambient Air
Regenerative Thermal Oxidizer	

5a. Applicable Rules:

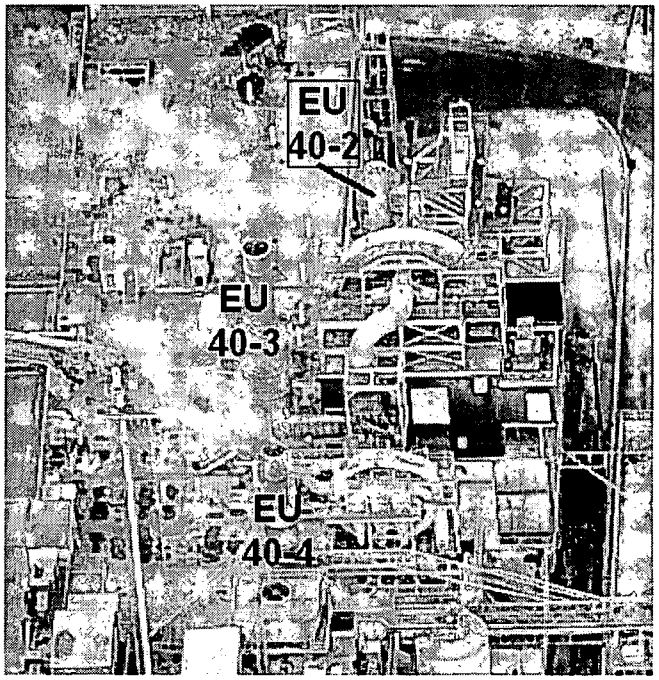
Local	State
IAPCB 6.5-1-2 Particulate Matter (PM)	326 IAC 6.5-1-2 Particulate Matter (PM)
IAPCB 6.5-6-25 PM (Source Specific)	326 IAC 6.5-6-25 PM (Source Specific)
IAPCB 2-7-5(13) Preventative Maintenance Plan (PMP)	326 IAC 2-7-5(13) Preventative Maintenance Plan (PMP)
IAPCB 2-1.1-11 Stack Testing Requirements	326 IAC 2-1.1-11 Stack Testing Requirements
IAPCB 2-7-6(1) Compliance Requirements	326 IAC 2-7-6(1) Compliance Requirements
IAPCB 2-7-5(3) Record Keeping	326 IAC 2-7-5(3) Record Keeping

5b. Permit limits to Avoid Regulations:

Local	State
IAPCB 2-2 Prevention of Significant Deterioration (PSD)	326 IAC 2-2 Prevention of Significant Deterioration (PSD)
IAPCB 8-1-6 VOC (EU 575-2)	326 IAC 8-1-6 VOC (EU 575-2)

6. Observations Summary:

- On April 11, 2008, the plant tour and parametric monitoring annual inspection was conducted. The records review was conducted on April 22 and 25, 2008.
- Emission units in operation are as follows: 40-2, 40-3, 40-4, 575-1, 575-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5549-2, and 5549-28. These units were operating during the April 11, 2008 inspection. Refer to the equipment list, above, for current operating parameters. There were no observable visual emissions indicates that 0% opacity was observed.
- There were no violations discovered concerning visual emissions notations, pressure drop ranges, make-up water flow rate notations, or any required pH or temperature readings for the equipment above.



Aerial view of Drover Street Plant, East Side

Emission Limit/Standard

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

(a) Pursuant to CP 097-00042-97-01, issued March 24, 1997, A 097-00042-98-01, issued April 15, 1998, and in order to render the requirements of 326 IAC 2-2 not applicable:

(1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3 (Section D.2), 5502-4 (Section D.2), 5502-5 (Section D.2), 5502-6 (Section D.2), 5502-7 (Section D.2), 5503-1 (Section D.2), 5503-2 (Section D.2), 5503-3 (Section D.2), 5503-4 (Section D.2), 5503-5 (Section D.2) and 5503-6 (Section D.2) shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.932 per year and will render the requirements of 326 IAC 2-2 not applicable.

The input of corn grind from April 2007 to March 2008 was 21,367,316 bushels. This is within the permitted limit listed above.

(2) The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 2.50 lb PM/PM10 per ton of starch. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 28.11 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

The input of starch from April 2007 to March 2008 was 19,819 tons. This is within the permitted limit listed above.

(3) The SO_2 emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 8.05 pounds per hour. Compliance with this limit will limit SO2 emissions to less than or equal to 35.26 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

(4) The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,851 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit NOx emissions to less than or equal to 39 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

The natural gas use from April 2007 to March 2008 was 564 MMcf. This is within the permitted limit listed above. Natural gas is used primarily in the RTO and the dryer units.

(b) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	--	--
5549-2	0.02	--	--
5549-28	0.025	9.64	42.24

(c) Pursuant to M 097-00042-99-01, issued February 25, 1999, the total PM/PM10 emissions from stack 5502-7 (exhausting emissions from units 5502-1A through 5502-1D) shall not exceed 0.0114 gr/dscf, 4.53 lb/hr, and 19.856 tons per year. Compliance with this limit will render the requirements of 326 IAC 2-2 not applicable.

Emission Limit/Standard (Continued)

(d) Pursuant to CP 097-00042-99-01, issued June 11, 1999, the starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.581 lb PM/PM10 per ton of starch produced. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 42.3 tons per year, will satisfy the requirements of 326 IAC 6.5-6-25, and render the requirements of 326 IAC 2-2 not applicable.

The starch produced from April 2007 to March 2008 was 66,464 tons. This is within the permitted limit listed above in (d).

D.1.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the respective particulate matter emission limits in Condition D.1.1 for 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28, will ensure compliance with the requirements of 326 IAC 6.5-1-2.

D.1.3 Particulate Matter [326 IAC 6.5-6-25]

(a) Facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are limited as indicated in the table below:

Facility	*PM Limit (gr/dscf)*	*PM Limit (ton/yr)*
40-4	*0.02*	*44.1*
40-3	*0.016*	*42.3*
40-2	*0.016*	*31.9*
575-1	*0.011*	*32.4*
575-2	*0.011*	*32.4*

Compliance with these limits will satisfy the requirements of 326 IAC 6.5-6-25.

(b) Pursuant to CP 097-00042-95-02, issued March 8, 1995, the amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. Compliance with this limit will satisfy the requirements of 326 IAC 6.5-6-25.

The dry product processed from April 2007 to March 2008 was 64,979 tons. This is within the permitted limit listed above in (b).

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to CP 097-00042-95-03, issued October 6, 1995, the amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch. Compliance with this limit will render the requirements of 326 IAC 8-1-6 not applicable.

There has not been methanol emitting corn starch production from unit 575-2 since 1999; therefore, there are no starch production records to review.

Preventative Maintenance Plan (PMP)

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

✓ Prepared: ✓ Available on Site: ✓ Adequate: ___ NA

Compliance Response Plan

✓ Prepared: ✓ Available on Site: ✓ Adequate: ___ NA

Compliance Response Plans (CRPs) for the above units were included on each parametric monitoring log sheet.

Stack Testing Requirements

None required by the Title V permit.

Compliance Determination

D.1.6 Particulate and Sulfur Dioxide Control

(a) In order to comply with Conditions D.1.1, and D.1.2, the RTO shall be in operation and control particulate emissions from units 5502-1A, 5502-1B, and 5502-1C at all times those units are in operation.

(b) In order to comply with Condition D.1.1(a)(3), the 1st effect wash water system shall be in operation and control SO2 emissions from unit 5502-1A at all times the unit is in operation.

(c) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the scrubbers shall be in operation and control particulate emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, and 5549-28 at all times those units are in operation.

All control equipment was operating on the units observed in operation during the April 11, 2008 inspection.

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

No later than five (5) years from January 11, 2006, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform SO2 testing on emission unit 5502-1A, 5502-1B, 5502-1C and 5502-1D, utilizing methods as approved by the Commissioner. Testing shall be repeated every five (5) years and shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring

D.1.8 Visible Emission Notations

(a) Visible emission notations of exhaust from stacks 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-7, and 5549-28 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.

Upon records review concerning the above units, no violations were discovered regarding visible emission notations.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Compliance Monitoring (Continued)

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(f) Visible emission notations of exhaust from stack 5502-7 are not required during scheduled, routine bakeout events involving the natural gas-fired Regenerative Thermal Oxidizer (RTO), or equivalent control device, used for particulate and opacity control, provided that the Permittee meets the following conditions:

(1) The Permittee notifies the OAQ and OES at least twenty-four (24) hours in advance of a bakeout event;

Preceding the three bakeout events, the Source provided 24 hour notice to OES.

(2) The Permittee follows specific bakeout procedures outlined in the Preventive Maintenance Plan (PMP), thereby minimizing emissions during the bakeout event. Deviations from the procedures in the PMP during bakeout events will require that changes are made to the PMP;

(3) The Permittee completes bakeout events in an expeditious manner;

(4) The Permittee documents that bakeout event do not exceed three percent (3%) of the annual operating time of the RTO, or equivalent device; and

(5) The Permittee keeps records of the date and duration of each bakeout event.

Provided that these conditions are met, the Permittee is allowed a temporary alternative opacity limitation during bakeout events such that opacity shall not exceed sixty percent (60%) for more than a cumulative total of 14 hours in any twenty-four (24) period.

There were three bakeout events during the inspection period from May 18, 2007 to April 25, 2008. These occurred in December 2007 for nine (9) hours, February 2008 for fourteen (14) hours and April 2008 for approximately twelve (12) hours. This total duration of twenty-seven (27) hours is compliant as 3% of the 7,008 RTO operating hours is 210 hours.

D.1.9 Parametric Monitoring for Scrubbers, RTO and 1st Effect Wash Water System

(a) The Permittee shall monitor the pH and flow rate of the liquid through the nozzles of the 1st effect wash water to the GHE at least once per week of the system used to control SO2 emissions from unit 5502-1A. When for any one reading the pH of the liquid used in the 1st effect wash water is less than 6.5, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

There were no violations discovered concerning the RTO and the first effect wash system during this inspection regarding the pH and water flow rate.

Compliance Monitoring (Continued)

(b) *The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once per week from the scrubbers controlling emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2. When, for any one reading, the pressure drop across the scrubber is outside the range in the table listed below, or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. When, for any one reading, the make-up rate is less than the manufacturer's specifications, or a rate established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure drop or make-up rate reading that is outside ranges listed in the table below is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.*

Unit #	*Unit Name*	*Year installed or upgraded*	*Pressure Drop Range*
40-4	*#1 SFD Scrubber*	*1986*	*3" to 8"*
40-3	*#2 SFD Scrubber*	*1999*	*6" to 15"*
40-2	*#3 SFD Scrubber*	*1986*	*3" to 8"*
575-1	*#4 SFD Scrubber*	*1978 modified in plant*	*6" to 15"*
575-2	*#5 SFD Scrubber*	*1995*	*6" to 15"*
575-3	*#6 SFD Scrubber*	*1992*	*6" to 15"*
5549-1	*#1 SD Scrubber*	*1999*	*6" to 15"*
5549-2	*#2 SD Scrubber*	*1999*	*6" to 15"*

For the units listed in (b) above, during this inspection, there were no violations discovered concerning their pressure drop notations or pressure drops exceeding the permitted ranges.

(c) *The Permittee shall monitor the pressure drop across the scrubber at least once daily from the scrubber controlling emissions from unit 5549-28 when 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 6.0 to 15.0 inches of water, or a range that indicates proper operation of the unit, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.*

There were no pressure drop violations discovered during the records review or during the inspection for EU 5549-28.

(d) *A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.*

Operators record this reading each hour and a logging device averages continuous readings during each three hour period.

(e) *The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, D.1.2 and D.1.3, as approved by IDEM.*

During the inspection and records review, the RTO temperature did not drop below 1400°F while the equipment exhausting to the RTO was operating.

Compliance Monitoring (Continued)

(f) *On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.*

If the temperature did drop below 1400°F, the CRP was implemented and the RTO was brought back up to temperature or the records contained an operational graph of the associated equipment demonstrating that all units were down.

(g) *The instruments used for determining the pH, pressure drop, flow rate and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.*

D.1.10 Scrubber Malfunction

In the event that a scrubber malfunction has been observed, the affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.

Scrubbers are still inspected on a monthly or bimonthly basis and any repairs are noted in the records. No malfunctions were reported or noted in the records.

Record Keeping

D.1.11 Record Keeping Requirements

(a) *To document compliance with Condition D.1.1(a)(1), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1).*

(b) *To document compliance with Conditions D.1.1(a)(2), the Permittee shall maintain monthly records of the combined input of starch for units 5549-1 and 5549-2.*

(c) *To document compliance with Condition D.1.1(a)(4), the Permittee shall maintain monthly records of the total input of natural gas consumed by 5502-1A, 5502-1B, 5502-1C, and 5502-1D.*

(d) *To document compliance with Condition D.1.1(d), the Permittee shall maintain monthly records of the amount of starch produced by unit 40-3.*

(e) *To document compliance with Condition D.1.3(b), the Permittee shall maintain monthly records of the amount of dry product processed by unit 575-2.*

(f) *To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the amount of methanol emitting corn starch produced and VOC-containing reagent from unit 575-2.*

There has not been methanol emitting corn starch production from unit 575-2 since 1999, therefore there are no starch production records available.

(g) *To document compliance with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).*

Record Keeping (Continued)

(h) To document compliance with Conditions D.1.1(a)(3) and D.1.9(a), the Permittee shall maintain weekly records of the pH and flow rate of the 1st effect wash water during normal operations.

(i) To document compliance with Condition D.1.9(b), the Permittee shall maintain weekly records of the pressure drop across the scrubber and scrubber make-up rate during normal operation.

(j) To document compliance with Condition D.1.9(c), the Permittee shall maintain daily records of the pressure drop across the scrubber during normal operation. To document compliance with Condition D.1.9(c), the Permittee shall maintain a daily record of the pressure drop across scrubber used in conjunction with facility 5549-28. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(k) To document compliance with Condition D.1.9(d), the Permittee shall maintain continuous records (on a 3-hour average basis) for the RTO (unit 5502-1D) combustion chamber temperature during normal operations.

(l) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

For the units listed in (a) through (k) the required records were reviewed and were kept as per the associated permit section. Upon review, no violations were discovered.

Are required records on site? ✓ Yes ___No ___NA
Dates or amount of records checked: ***May 18, 2007 to April 25, 2008***
Are records consistent with observations? ✓ Yes ___No ___NA

Reporting

D.1.12 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.1.1, D.1.3 and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Have all required reports been submitted in a timely manner? ✓ Yes ___No ___NA
Are reports consistent with observations? ✓ Yes ___No ___NA

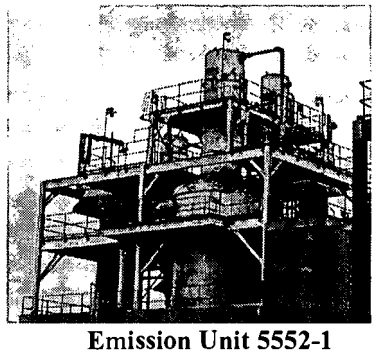
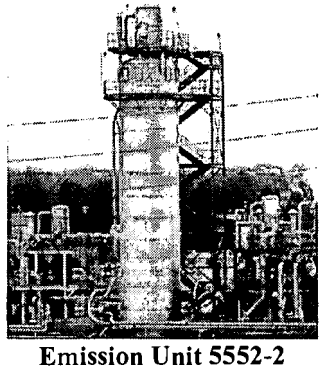
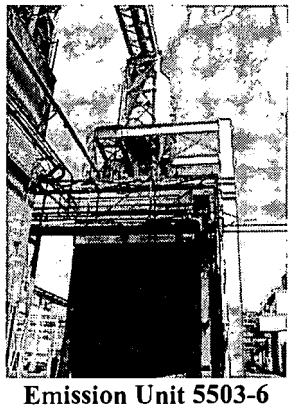
All available reports were reviewed no violations were discovered. See the Compliance Summary Report at the end of this report for a compliance determination.

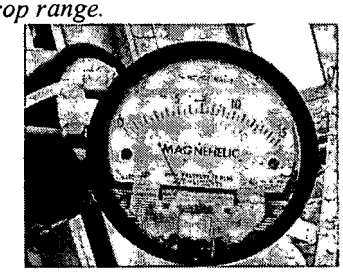
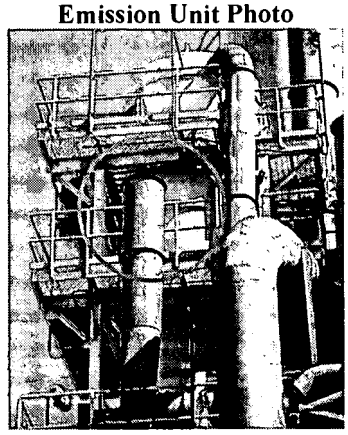
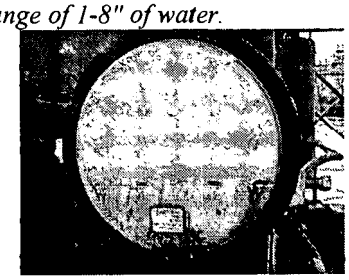
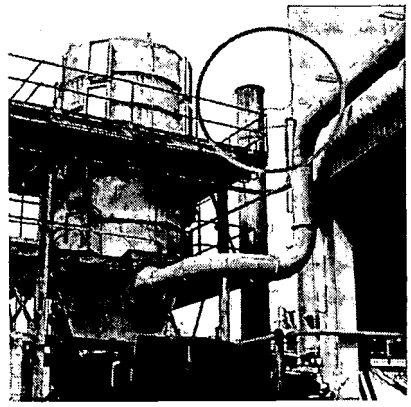
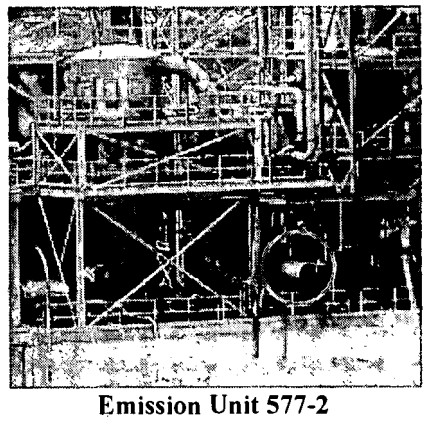
7. **Compliance Status:** No violations were discovered during the walk-through inspection or during the records review for this equipment of this D section.

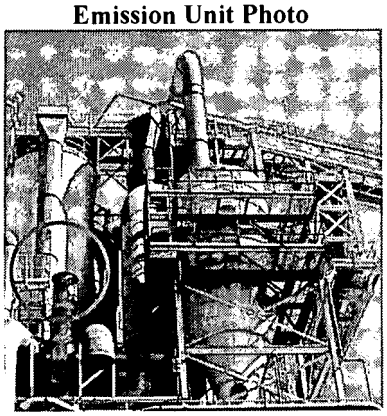
8. **Additional Comments:** None.

Permit Number(s): T097-7714-00042
General Description: Various drying process for different starch products.

D.2 1. Process Description/
2. Equipment:

Emission Unit	Observations	Emission Unit Photo
(n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with emissions controlled by an integral baghouse, and exhausting to stack 71-9.	*Not observed in operation on 04/11/08.*	No photo taken
(o) One (1) Chilsonator, identified as unit 5552-1, with emissions controlled by an integral baghouse, and exhausting to stack 5552-1.	*This unit was operating on 04/11/08 and there were no observable VEs.* *The source will be moving this unit into the Insignificant Activities section of the permit as it has an integral baghouses and produces insignificant emissions according to the Source's potential to emit (PTE) calculations.* **Emission Unit 5552-1**	 **Emission Unit 5552-1**
(p) One (1) Chilsonator Hopper, identified as unit 5552-2, with emissions controlled by an integral baghouse, and exhausting to stack 5552-2.	*This unit was operating on 04/11/08 and there were no observable VEs.* *The source will be moving this unit into the Insignificant Activities section of the permit as it has an integral baghouses and produce insignificant emissions according to the Source's potential to emit (PTE) calculations.* **Emission Unit 5552-2**	 **Emission Unit 5552-2**
(q) One (1) Truck Loadout Collector, identified as unit 5503-6, constructed in 1999, with emissions controlled by a baghouse, and exhausting to stack 5502-3.	*This unit was operating on 04/11/08 and there were no observable VEs.* ***As per the permit modification in 097-24287-00042, this unit now exhausts into the Feed Dust Collector (DC), Stack 5502-3.*** **Emission Unit 5503-6**	 **Emission Unit 5503-6**

Emission Unit	Observations	Emission Unit Photo
(r) One (1) Germ Bin, one (1) Pellet Bin #1, one (1) Pellet Bin #2, and one (1) Loadout Dust Collection System, identified as units 5503-2, 5503-3, 5503-4, and 5503-5, respectively, each constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-2.	*These units were operating on 04/11/08 and the pressure drop for the cyclone, stack 5503-2, was 2.2" of water. This is in the 1-8 pressure drop range.*  **Loadout Dust Collector , PD gauge of Stack 5503-2**	 **Emission Unit 5503-2**
This dust collector receives the exhaust from EU 5502-3, the hammer mill; EU 5503-6, truck load out; and EU 5502-4, the two loose feed bins. This last connection could be a permit violation and was referred to OES Enforcement on May 1, 2008 as a potential violation.	*This unit was operating on 04/11/08 and there were no observable VEs. The pressure drop was 2.0" of water. This is compliant with the permitted range of 1-8" of water.*  **Feed Dust Collector , PD gauge of Stack 5502-3**	 **Feed Dust Collector and Stack 5502-3**
(s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, constructed in 1977, with emissions controlled by a baghouse, and exhausting to stack 71-7	*Not observed in operation on 04/11/08.*	No photo taken **Emission Unit 71-7**
(t) One (1) RSP North Packing Line, identified as unit 577-2, constructed in 1979 and modified in 2000, with emissions controlled by a baghouse, and exhausting to stack 577 2.	*The stack is the pipe below and to the right of the unit (circled). This unit was not observed in operation on 04/11/08.* **Emission Unit 577-2**	 **Emission Unit 577-2**

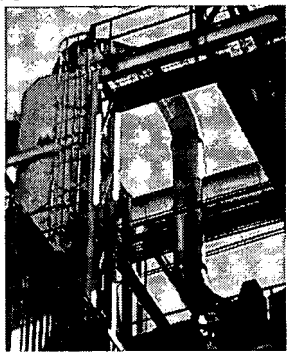
Emission Unit	Observations	Emission Unit Photo
(u) One (1) Gluten Receiver, identified as unit 5503-1, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-1	*This unit was operating during the inspection on 04/11/08 and there were no observable VEs. Stack is circled.*	

Emission Unit 5503-1

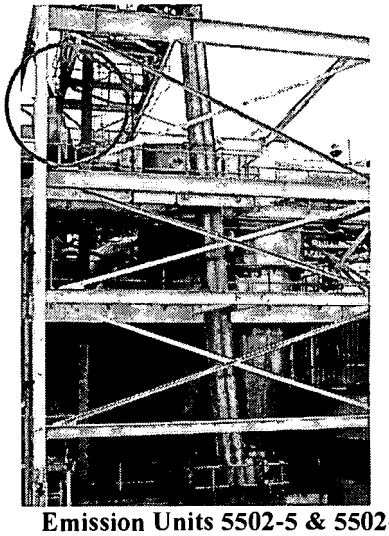
Gluten DC, EU 5503-1

(v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, respectively, each constructed in 1997, with emissions controlled by a high efficiency cyclone, and exhausting to stacks 5502-5 and 5502-6 respectively.

The germ cooler and pellet cooler were in operation and there were no observable VEs.
Stack 5502-6 is out of view.
Square stack 5502-5 is circled.



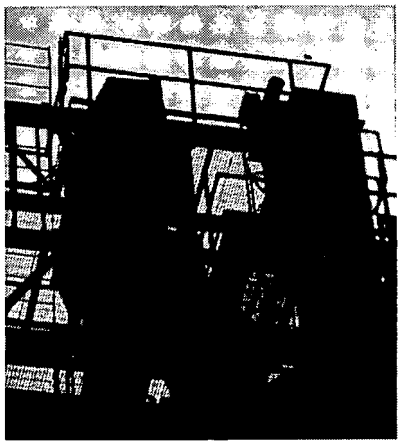
EU 5502-5 (Cyclone) for Emission Unit 5502-5



Emission Units 5502-5 & 5502-6

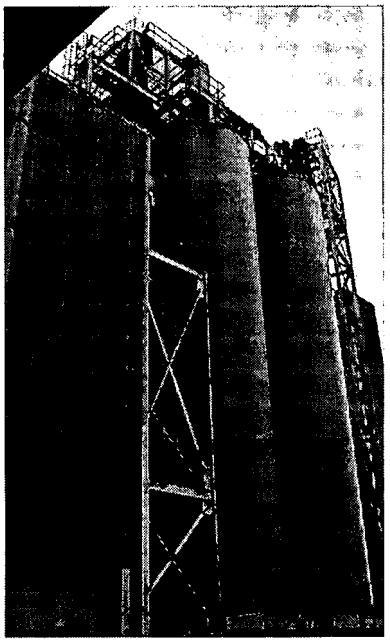
(w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-4

This connection to the dust collector exhausting to Stack 5502-3 is a permit change requested in 097-23497-00042. This was performed before the permit was issued and was referred to OES Enforcement on May 1, 2008 as a potential violation.

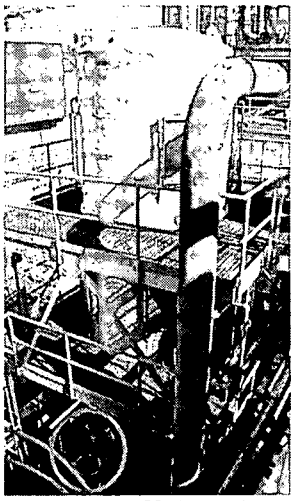
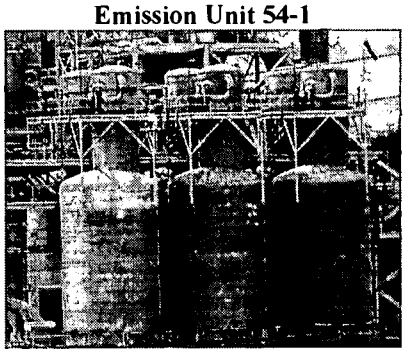
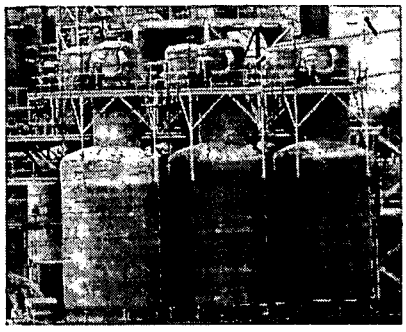


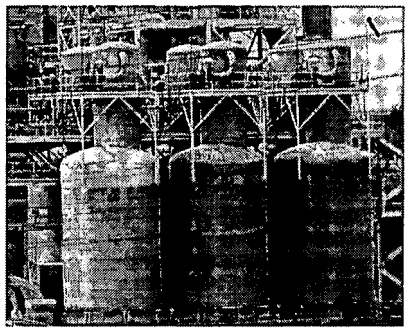
These loose feed bins (see photo to right) were in operation and there were no observable VEs. This baghouse was disconnected and routed to the Feed DC, Stack 5502-3, in November 2007.

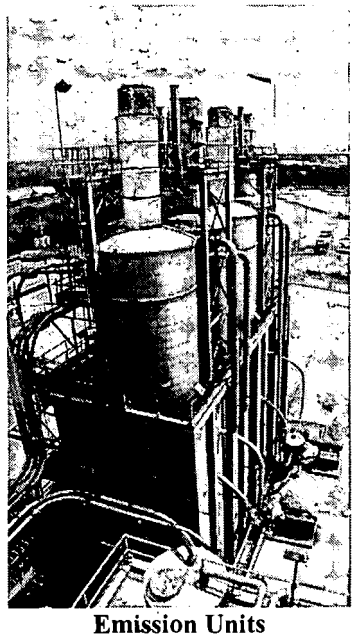
Emission Unit 5502-4 (Baghouse)

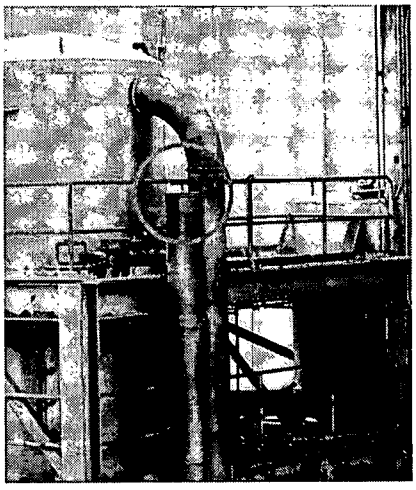
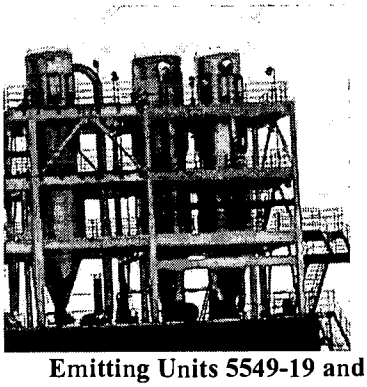
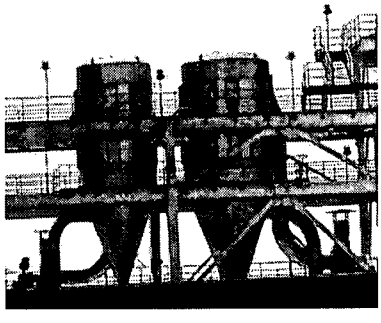
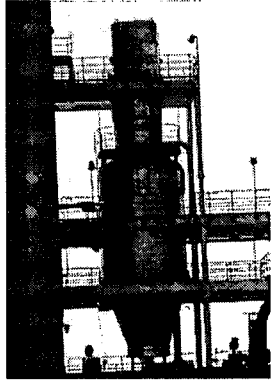


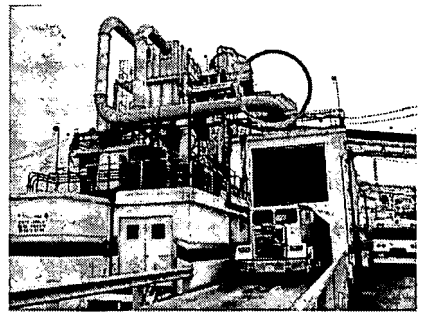
Emission Unit 5502-4 (Bins)

Emission Unit	Observations	Emission Unit Photo
(x) One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.	*No Photo taken of Hammer Mill EU 5502-3.*	
(y) One (1) DSE Bag Slitter, identified as unit 42-10, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 42-10.	*EU 5502-3 was operating on 04/11/08 and there were no observable VEs. The pressure drop was 2.0" of water. This is compliant with the permitted range of 1-8" of water.*	
	Unit42-10 was not operating on 04/11/08. Stack 42-10 is circled.	**Emission Unit 42-10**
	Emission Unit 5502-3	
(z) One (1) P-6 Rework Station, identified as unit 54-1, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 54-1.	*Not in operation on 04/11/08.*	No photo taken
	Emission Unit 54-1	**Emission Unit 54-1**
(aa) One (1) RSP Hopper #4, identified as unit 577-5, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-5	*Both units were not observed operating on 04/11/08.*	
(bb) One (1) RSP Hopper #6, identified as unit 577-6, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-6.	*(Grouping of six identical units)*	
	Emission Unit 577-5 and 577-6	**Emission Unit 577-5 and 577-6**
(cc) One (1) RSP Hopper #5, identified as unit 577-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-7.	*Both units were not observed operating on 04/11/08.*	
(dd) One (1) RSP Hopper #1, identified as unit 577-8 constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-8.	*(Grouping of six identical units)*	
	Emission Units 577-7 and 577-8	**Emission Units 577-7 and 577-8**

Emission Unit	Observations	Emission Unit Photo
(ee) One (1) RSP Hopper #2, identified as unit 577-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-9. (ff) One (1) RSP Hopper #3, identified as unit 577-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-10.	*Both units were not observed operating on 04/11/08.* *(Grouping of six identical units)* **Emission Units 577-9 and 577-10**	 **Emission Units 577-9 and 577-10**
(gg) One (1) Industrial Packer, identified as unit 71-1, constructed in 1994, with emissions controlled by a baghouse, and exhausting to stack 71-1	*Not in operation on 04/11/08.*	No photo taken
(hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, constructed in 1993, each with emissions controlled by an integral baghouse, and exhausting to stacks 5549-3 and 5549-4.	*Both units were not in operation on 04/11/08.*	 **Emission Unit 5549-3 & 5549-4**
(ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-7.	**Emission Unit 5549-3 & 5549-4** *Spray Dryer Storage Hoppers or bins operating on 04/11/08 were EU 5549-7 and 5549-10 with no observable VEs.*	See Photo Below

Emission Unit	Observations	Emission Unit Photo
(jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-8 (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-9. (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-10.	*Spray Dryer Storage Hoppers or bins 5549-8 and 5549-9 were not operating on 04/11/08.*	
	Emission Units 5549-7 thru 5549-10	**Emission Units 5549-7 thru 5549-10**
(mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, constructed in 1995, with emissions controlled by an integral baghouse, and exhausting to stack 5549-12. (nn) One (1) Agglomerator, identified as unit 5549-13, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-13.	*Both EU 5549-12 was in operation on 04/11/08 and there were no observable VEs. These units may exhaust to the same stack.* ***This shared stack will be mentioned to OES Permitting.*** *EU 5549-13 was not in operation on 04/11/08.*	
	Emitting units 5549-12 & 5549-13	**L to R: 5549-12, 5549-13, 5549-14**
(oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-14.	*EU 5549-14 was in operation on 04/11/08 and there were no observable VEs.*	
	Emitting Unit 5549-14	**Emitting Unit 5549-14**

Emission Unit	Observations	Emission Unit Photo
(pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units: (1) East Box Packer Filter Receiver, identified as unit 5549-16, with emissions controlled by an integral baghouse, and exhausting to stack 5549-16. (2) West Box Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.	*These units were in operation on 04/11/08. The units are combined into one building and exhaust through the same stack.* ***This shared stack and the question of the integral baghouse, compared to the stack in the photo, will be mentioned to OES Permitting.***	
	Emitting Unit 5549-16 and 5549-17	**Emitting Unit 5549-16 and 5549-17**
(3) Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18 (4) Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.	*EU 5549-19 was in operation on 04/11/08. The units are combined into one building and exhaust to an integral baghouse.* *EU 5549-18 was not in operation on 04/11/08.*	
	Emitting Units 5549-19 and 5549-18	**Emitting Units 5549-19 and 5549-18**
(5) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20. (6) Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.	*Both of these units were operating on 04/11/08 and there were no observable VEs. The pressure drop for 5549-20 was 2.1 " of water and the pressure drop for 5549-21 was 2.9 " of water. These readings were within the permitted range of 1-8" of water.*	
	Emitting Units 5549-20 & 5549-21	**Emitting Units 5549-20 & 5549-21**
(7) Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.	*This unit was in operation on 04/11/08 with a pressure drop of 2.3" of water which is compliant with the 0-6" water permitted range.*	

Emission Unit	Observations	Emission Unit Photo
(qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.	*This corn dump process was operating on 04/11/08 and no VE was observed during unloading. Stack is circled.*	 Emission Unit 56-1

3. Pollutants Emitted: ___SO_2, ___NOx, ✓ PM, ✓ PM_{10}, ___CO, ___VOC, ___HAPs

4. Control Equipment:

Control Equipment/Identification	Exhaust to:
Wet scrubbers	Ambient Air
Cyclones	

5a. Applicable Rules:

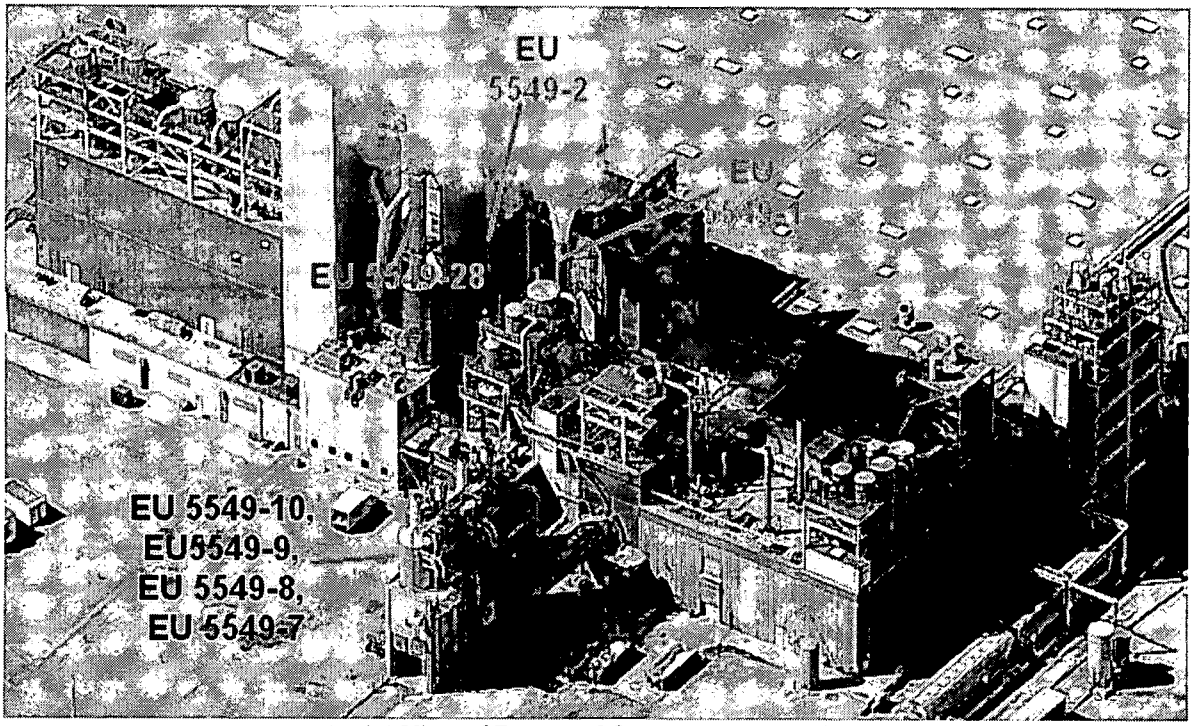
Local	State
IAPCB 6.5-1-2 Particulate Matter (PM)	326 IAC 6.5-1-2 Particulate Matter (PM)
IAPCB 6.5-6-25 PM (Source Specific)	326 IAC 6.5-6-25 PM (Source Specific)
IAPCB 2-7-5(13) Preventative Maintenance Plan (PMP)	326 IAC 2-7-5(13) Preventative Maintenance Plan (PMP)
IAPCB 2-7-6(1) Compliance Requirements	326 IAC 2-7-6(1) Compliance Requirements
IAPCB 2-7-5 Record Keeping	326 IAC 2-7-5 Record Keeping

5b. Permit limits to Avoid Regulations:

Local	State
IAPCB 2-2 PSD	326 IAC 2-2 PSD

6. Observations:

- On April 11, 2008, the walk-through portion of the annual inspection was conducted. The records review was not conducted until 05/17/07 and 05/18/07.
- Emission unit 5552-1, 5552-2, 5503-2, 5503-3, 5503-3, 5503-4, 5503-5, 5503-6, 5503-1, 5502-5, 5502-6, 5502-4, 5502-3, 5549-7, 5549-10, 5549-12, 5549-14, 5549-16, 5549-17, 5549-19, 5549-20, 5549-21, 5549-26 and 56-1 were operating during the April 11, 2008 inspection. No visible emissions were observed from these stack exits; therefore, Visible Emissions Evaluations (VEEs) were not necessary.
- Pressure drop readings observed are recorded in the equipment list table above. All readings, were in range during the April 11, 2008 inspection.



Aerial View of Raymond Street Plant, East Side

Emission Limit/Standard **Permit 097-20891-00042**

D.2.1 Prevention of Significant Deterioration: PM and PM10 Limitations [326 IAC 2-2]

(a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, and SSM 097-11362-00042, issued August 31, 2000, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
577-2	0.01	1.29	5.65
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-7	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52
5549-3	0.01	0.15	0.64
5549-4	0.01	0.15	0.64
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5502-3	0.01	0.96	4.212
5502-4	0.01	0.016	0.069
5502-5	0.01	1.13	4.964
5503-1	0.01	1.53	6.69
5503-2 through 5503-5	0.01	0.99	3.11
5503-6 (stack 5503-6)	0.01	1.43	1.148
5502-6	0.01	0.99	4.349
5549-16	0.01	0.02	0.08
5549-17	0.01	0.04	0.15
5549-18	0.01	0.28	1.21
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
71-9	0.01	0.13	0.57
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

(b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1D (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. The total emission rate shall not exceed 0.0030 lb PM/PM10 per bushel. Compliance with this limit is equivalent to total PM/PM10 emissions of less than 44.396 tons per year.

(c) The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per ton of starch. Compliance with this limit is equivalent to PM/PM10 emissions of less than 4.29 tons per year.

(d) Facility 5503-6 shall not operate more that 1,602 hours per twelve consecutive month period with compliance determined at the end of each month.

This unit operated 482 hours with stack 5503-6 and this is compliant with the 1602 hour limit as per (d) above. This unit was disconnected from stack 5503-6 on October 10, 2007 and exhausted into the DC exhausting to Stack 5502-3. This change was permitted on August 23, 2007.

Emission Limit/Standard **Permit 097-24287-00042**

Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

D.2.1 Prevention of Significant Deterioration: PM and PM10 Limitations [40 CFR 52.21] [326 IAC 2-2]

(a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, SSM 097-11362-00042, issued August 31, 2000, and SPM 097-24287-00042, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	*PM/PM_{10} Limit (gr/dscf)*	*PM/PM_{10} Limit (lb/hr)*	*PM/PM_{10} Limit (ton/yr)*
577-2	*0.01*	*1.29*	*5.65*
577-5	*0.009*	*0.35*	*1.52*
577-6	*0.009*	*0.35*	*1.52*
577-7	*0.009*	*0.35*	*1.52*
577-8	*0.009*	*0.35*	*1.52*
577-9	*0.009*	*0.35*	*1.52*
577-10	*0.009*	*0.35*	*1.52*
5549-3	*0.01*	*0.15*	*0.64*
5549-4	*0.01*	*0.15*	*0.64*
5549-7	*0.01*	*0.039*	*0.17*
5549-8	*0.01*	*0.039*	*0.17*
5549-9	*0.01*	*0.039*	*0.17*
5549-10	*0.01*	*0.039*	*0.17*
5549-12	*0.01*	*0.13*	*0.57*
5549-13	*0.01*	*0.98*	*4.29*
5549-14	*0.01*	*0.24*	*1.07*
5502-3 & 5503-6 (stack 5502-3)	0.01	0.96	4.393
5502-4	*0.01*	*0.016*	*0.070*
5502-5	*0.01*	*1.13*	*5.177*
5503-1	*0.01*	*1.53*	*6.977*
5503-2 through 5503-5	*0.01*	*0.71*	*3.11*
5502-6	*0.01*	*0.99*	*4.349*
5549-16	*0.01*	*0.02*	*0.08*
5549-17	*0.01*	*0.04*	*0.15*
5549-18	*0.01*	*0.28*	*1.21*

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
71-9	0.01	0.13	0.57
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

(b) *The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1D (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.932 tons per year and will render the requirements of 326 IAC 2-2 not applicable.*

The combined input of corn to the grind units was 21,367,316 bushels in the 12 month rolling period from February 2007 to March 2008.

(c) *The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per ton of starch. Compliance with this limit is equivalent to PM/PM10 emissions of less than 4.29 tons per year.*

The input of starch to unit 5549-13, the Agglomerator, from March 2006 to March 2007 was 3,652 tons.

Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

All production records showed compliance with this D section. No violations were discovered.

D.2.2 *Particulate Matter [326 IAC 6.5-1-2]*

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the limits in Condition D.2.1 for facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 will ensure compliance with the requirements of 326 IAC 6.5-1-2.

D.2.3 *Particulate Matter - Marion County [326 IAC 6.5-6-25]*

(a) *Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 42-10 shall not exceed 0.03 gr/dscf and 2.4 tons per year.*

(b) *Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 56-1 shall not exceed 0.02 gr/dscf and 7.02 tons per year.*

(c) *Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 71-1 shall not exceed 0.03 gr/dscf and 0.9 tons per year.*

Preventative Maintenance Plan

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities 577-2, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-16 through 5549-21, 5549-26, 71-9, 5552-1, and 5552-2 and their respective control devices.

✓ Prepared: ✓ Available on Site: ✓ Adequate: ___ NA

Compliance Response Plan

✓ Prepared: ✓ Available on Site: ✓ Adequate: ___ NA

These CRPs for the above units were included on each parametric monitoring log sheet.

Stack Testing Requirements

None required by the Title V permit.

Compliance Determination

D.2.5 Particulate Control

(a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the respective baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.

(b) In order to comply with Conditions D.2.1 and D.2.2, the high efficiency cyclones for particulate control shall be in operation and control particulate emissions from facilities 5502-5 and 5502-6 at all times the respective facilities are in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

All associated control equipment was operating when the emitting units were observed in operation on April 11, 2008.

Compliance Monitoring Permit 097-20891-00042

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the exhaust from stacks 5549-3, 5549-4, 5503-6, and 5549-13 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.

VE notations were taken for the equipment indicated above for the term of this permit.

(b) Visible emission notations of the exhaust from stacks 71-9, 5552-1, 5552-2, 5503-2, 577-2, 5503-1, 5502-4, 5502-3, 577-5 through 577-10, 5549-7 through 5549-10, 5549-12, 5549-14, 5549-16 through 5549-21, and 5549-26 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.

VE notations were taken for the equipment indicated above for the term of this permit.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

Compliance Monitoring Permit 097-20891-00042 (Continued)

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

During records review, no violations were discovered.

Compliance Monitoring Permit 097-24287-00042

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the exhaust from stacks 5549-3, 5549-4, and 5549-13 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.

(b) Visible emission notations of the exhaust from stacks 71-9, 5552-1, 5552-2, 5503-2, 577-2, 5503-1, 5502-4, 5502-3, 577-5 through 577-10, 5549-7 through 5549-10, 5549-12, 5549-14, 5549-16 through 5549-21, and 5549-26 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.

VE observations were stopped for EU 5502-4 in November 2007 as the unit was disconnected and routed to the Feed DC, Stack 5502-3, in November 2007. This connection to the dust collector exhausting to Stack 5502-3 is a change requested in the draft permit 097-23497-00042 and is a potential violation.
On September 6, 2007 the VE notations were missing for 577-02, 577-05, 577-06, 577-07, 577-08, 577-09, and 577-10. These missing data were reported as deviations in the 3Q and ACC 2007 reports. The early stack connection and seven (7) missing VE notations were referred to OES Enforcement on May 1, 2008.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

During the records review, any abnormal VE readings had reasonable response steps performed and noted on the observation sheet.

Compliance Monitoring Permit 097-20891-00042

D.2.7 Parametric Monitoring for Baghouses

(a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 5503-6 and 5549-13 at least once per day when the respective facilities are in operation.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 at least once per day when the respective facilities are in operation.

(c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.

(d) The instrument used for measuring the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

Pressure drop readings were conducted on each required day for the duration of this permit term for the above equipment. During records review, for the term of this permit, there were no violations discovered.

Compliance Monitoring Permit 097-24287-00042

D.2.7 Parametric Monitoring for Baghouses

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with facilities 5502-3, 5503-6 and 5549-13 at least once per day when the respective facilities are in operation.

Readings were stopped for EU 5503-6 on October 12, 2007 as the permit change, on August 23, 2007, was made to have the exhaust vent into DC 5502-3 and exhaust out Stack 5502-3.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 at least once per day when the respective facilities are in operation.

(c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.

(d) The instrument used for measuring the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

Unit 5549-13 had a missing pressure drop on March 29, 2008 and Unit 577-2 had a missing pressure drop on September 6, 2007 and the CRP was not implemented in either case. On October 11, 2007 Unit 5503-2 exceeded the pressure drop range of 1-8" of water with a reading of zero (0) and the CRP was not implemented. These three (3) violations were referred to OES Enforcement on May 1, 2008.

Compliance Monitoring Permit 097-24287-00042 (Continued)

D.2.8 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed units and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.9 Cyclone Failure Detection
In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B-Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record keeping Permit 097-20891-00042

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.1(c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.

These records were reviewed for unit 5549-13 and no violations were discovered.

(b) To document compliance with Condition D.2.1(d), the Permittee shall maintain records of the operating schedule for facility 5503-6.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the once per day visible emission notations of the stack exhaust.

These records were reviewed for the stack exhausts and no violations were discovered

(d) To document compliance with Condition D.2.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The records used to document compliance with Conditions D.1.1 are sufficient to document compliance with Conditions D.2.1(b) and D.2.1(c).

Are required records on site? ✓ Yes ___No ___NA
Dates or amount of records checked: ***May 18, 2007 to August 22, 2007***
Are records consistent with observations? ✓ Yes ___No ___NA

Record keeping Permit 097-24287-00042

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.1(c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.

These records were reviewed for unit 5549-13 and no violations were discovered.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

These records were reviewed for the stack exhausts and no violations were discovered with the exception of missing VE notations for 577-02, 577-05, 577-06, 577-07, 577-08, 577-09, and 577-10 on September 6, 2007. This accounts for seven (7) violations which were referred to OES Enforcement on May 1, 2008.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of the pressure drop across the baghouses used in conjunction with facilities 5502-3, 5503-6, 5549-13, 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

The pressure drop was missing for EU 577-2 on September 6, 2007 and for 5549-13 on March 29, 2008. These violations were referred to OES Enforcement on May 1, 2008. On October 11, 2007 Unit 5503-2 exceeded the pressure drop range of 1-8" of water with a reading of zero (0) and the CRP was not implemented. After reviewing all other records for the other units, no violations were discovered.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The records used to document compliance with Conditions D.1.1 are sufficient to document compliance with Conditions D.2.1(b) and D.2.1(c).

Are required records on site? ✓ Yes ___ No ___ NA
Dates or amount of records checked: ***August 23, 2007 to April 25, 2008***
Are records consistent with observations? ✓ Yes ___ No ___ NA

Reporting

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(c), (b), and (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Have all required reports been submitted in a timely manner? ✓ Yes ___ No ___ NA
Are reports consistent with observations? ✓ Yes ___ No ___ NA

All compliance reports were submitted within 30 days of the end of the quarter. See Compliance Summary Report at the end of this report for a compliance determination

7. **Compliance Status:** There were ten (10) violations and one potential violation of the D Sections of the latest permit, 097-24287-00042 and these were referred to OES Enforcement on May 1, 2008.
   1) Unit 5549-13 had a missing pressure drop on March 29, 2008 and Unit 577-2 had a missing pressure drop on September 6, 2007. On October 11, 2007 Unit 5503-2 exceeded the pressure drop range of 1-8" of water with a reading of zero (0) and the CRP was not implemented in any of the three cases. This totals three (3) pressure drop violations.
   2) VE observations were stopped for EU 5502-4 in November 2007 as the unit was disconnected and routed to the Feed DC, Stack 5502-3, in November 2007. This connection to the dust collector exhausting to Stack 5502-3 is a change requested in the draft permit 097-23497-00042 and is a potential violation.
   3) On September 6, 2007 the VE notations were missing for 577-02, 577-05, 577-06, 577-07, 577-08, 577-09, and 577-10. These missing data were reported as deviations in the 3Q and ACC 2007 reports. This totals seven (7) missing VE violations.

8. **Additional Comments:** OES permits will be made aware of some clarifications that may need to be made with some equipment and stacks. See permit discussion on page :

Permit Number(s): T097-7714-00042
General Description: Various corn milling processes.

D.3 **1. Process Description/**
2. Equipment:

(a) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]

(1) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6.5-6-25]

(2) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6.5-6-25]

(3) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6.5-6-25]

(4) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6.5-6-25]

(5) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6.5-6-25]

(6) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6.5-6-25]

(7) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6.5-6-25]

(8) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6.5-6-25]

(9) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6.5-6-25]

(10) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6.5-1-2]

(11) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6.5-1-2]

(12) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6.5-1-2]

(13) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6.5-1-2]

(14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6.5-1-2]

(15) One (1) CWS Entoleter Mill; identified as unit 63-17; [326 IAC 6.5-1-2]

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 3-7-1(21)(G)(vi)(CC)][326 IAC 8-3-3]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(g)(xiii)][326 IAC 6-4]

(d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: [326 IAC 2-7-1(21)(B)]

(1) One (1) 152-1 Filter Receiver; [326 IAC 6.5-1-2]

(2) One (1) 152-2 Mixer baghouse; [326 IAC 6.5-1-2]

(3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6.5-1-2]

(4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6.5-1-2]

(5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6.5-1-2]

(6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6.5-1-2]

(7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6.5-1-2]

(8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6.5-1-2]

(9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6.5-6-25]

(10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6.5-1-2]

(11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6.5-6-25]

(12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6.5-1-2]

(13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6.5-1-2]

(14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6.5-1-2]

(15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6.5-1-2]

(16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6.5-6-25]

(17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6.5-1-2]

(18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6.5-1-2]

(19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6.5-6-25]

(20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6.5-1-2]

(21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6.5-1-2]

(22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6.5-1-2]

(23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6.5-1-2]

(24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6.5-6-25]

(25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6.5-1-2]

(26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6.5-1-2]

(27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6.5-1-2]

(28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6.5-1-2]

(29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6.5-6-25]

(30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6.5-6-25]

(31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6.5-1-2]

(32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6.5-1-2]

(33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6.5-1-2]

(34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6.5-1-2]

(35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6.5-1-2]

(36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6.5-1-2]

(37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6.5-1-2]

(38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6.5-1-2]

(39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6.5-6-25]

(40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6.5-1-2]

(41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6.5-1-2]

(42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6.5-1-2]

(43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6.5-1-2]

(44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6.5-1-2]

(45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6.5-1-2]

(46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6.5-1-2]

(47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6.5-1-2]

(48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6.5-6-25]

(49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6.5-1-2]

(50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6.5-6-25]

(51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6.5-6-25]

(52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6.5-6-25]

(53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6.5-6-25]

(54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6.5-6-25]

(55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6.5-6-25]

(56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6.5-6-25]

(57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6.5-6-25]

(58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6.5-6-25]

(59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6.5-6-25]

(60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6.5-6-25]

(61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6.5-6-25]

(62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6.5-6-25]

(63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6.5-1-2]

(64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6.5-1-2]

(65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6.5-1-2]

(66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6.5-1-2]

(67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6.5-1-2]

(68) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6.5-1-2]

(69) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6.5-1-2]

(70) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6.5-1-2]

(71) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6.5-1-2]

(72) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6.5-1-2]

(73) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6.5-1-2]

(74) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6.5-1-2]

(75) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6.5-1-2]

(76) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582; [326 IAC 6.5-1-2]

(77) One (1) Blending Bin identified as unit TF31901 venting through product recovery DC-31901, Bld 630, venting out stack 1; [326 IAC 6.5-1-2]

(78) One (1) Base Bin identified as unit TF31902 venting through product recovery DC-31902, Bld 630, venting out stack 2; [326 IAC 6.5-1-2]

(79) One (1) Product Bin identified as unit TF31991 venting through product recovery DC-31991, Bld 630, venting out stack 3; [326 IAC 6.5-1-2]

(80) One (1) Surge Tank Bin identified as unit SH31913 venting through product recovery DC-31911, Bld 630, venting out stack 7; [326 IAC 6.5-1-2]

(81) One (1) Bulk Bag Unload Bin with integral dust collector , identified as unit DC-31900, Bld 630, venting out stack 8; [326 IAC 6.5-1-2]

(82) One (1) FBR exhaust through product recovery metal filters, Bld 630, identified as unit TR31912 venting out stack 5; [326 IAC 6.5-1-2]

(83) One (1) starch dryer identified as unit T-1, constructed in 2005, with a maximum production rate of 300 lbs/hr, with emissions controlled by integral product collector/cyclone and duct collector and exhausting through T-1 stack; [326 IAC 6.5-1-2]

(84) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, constructed in 2006, with emissions controlled by integral product collector and exhausting through stack 5549-22. [326 IAC 6.5-1-2]

3. Pollutants Emitted: ___SO_2, ___NOx, _X_ PM, _X_ PM_{10}, ___CO, _X_ VOC, ___HAPs

4. Control Equipment:

Control Equipment/Identification	Exhaust to:
Baghouses	Ambient Air

5a. Applicable Rules:

Local	State
IAPCB 6-1-2 Particulate Emissions	326 IAC 6-1-2 Particulate Emissions
IAPCB 6-1-12 Particulate Emissions	326 IAC 6-1-12 Particulate Emissions
IAPCB 8-3-2 Volatile Organic Compounds	326 IAC 8-3-2 Volatile Organic Compounds
IAPCB 8-3-5 Volatile Organic Compounds	326 IAC 8-3-5 Volatile Organic Compounds

6. Observations:

- Some of these units were observed during the walk through portion of the inspection. If units were operating, their control equipment was also operating. No opacity was observed which does not warrant visible emission evaluations (VEEs).
- The degreasing operations were not observed during this inspection.

Emission Limit/Standard

D.3.1 Particulate Matter [326 IAC 6.5-1-2]
Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from all insignificant activities listed above which have a potential to emit PM, and are not subject to the requirements of 326 IAC 6.5-6-25, shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.3.2 Particulate Matter - Marion County [326 IAC 6.5-6-25]
Pursuant to 326 IAC 6.5-6-25, the following insignificant activities are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
56-2	0.01	11.3
71-2	0.03	2.6
61-6	0.03	0.1

61-14A	0.029	0.6
61-14	0.028	1.2
42-4	0.029	2.3
61-9	0.016	4.1
42-1	0.03	0.9
42-6	0.03	2.5
42-8	0.03	4.2
42-7A	0.032	1.7
42-7B	0.032	1.7
42-7C	0.032	1.7
42-3A	0.032	1.8
42-3B	0.032	1.8
42-3C	0.032	1.8
42-3D	0.032	1.8
42-3E	0.032	1.8
42-3F	0.032	1.8
71-4A	0.03	0.3
71-5A	0.026	0.3
71-5B	0.026	0.3
71-5C	0.026	0.3
71-5D	0.026	0.3
71-5E	0.026	0.3
71-5F	0.026	0.3
71-5G	0.026	0.3
71-5H	0.026	0.3
71-5I	0.026	0.3
71-5J	0.026	0.3
71-5K	0.026	0.3
71-5L	0.026	0.3

D.3.3

Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning degreasing operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{o}C$) (one hundred degrees Fahrenheit ($100^{o}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{o}C$) (one hundred degrees Fahrenheit ($100^{o}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{o}C$) (one hundred degrees Fahrenheit ($100^{o}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{o}C$) (one hundred twenty degrees Fahrenheit ($120^{o}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Preventative Maintenance Plan
None required by the Title V permit.

___Prepared: ___Available on Site: ___Adequate: ✓ NA

Compliance Response Plan
___Prepared: ___Available on Site: ___Adequate: ✓ NA

Stack Testing Requirements
None required by the Title V permit.

Compliance Determination
D.3.5 Particulate Control
In order to comply with Conditions D.3.1 and D.3.2, the baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation

All respective control equipment was operating on the units observed in operation during the April 11, 2008 inspection.

Compliance Monitoring
None required by the Title V permit.

Record keeping
None required by the Title V permit.

Are required records on site? ___Yes ___No ✓ NA
Dates or amount of records checked:
Are records consistent with observations? ___Yes ___No ✓ NA

Reporting
None required by the Title V permit.

Have all required reports been submitted in a timely manner? ___Yes ___No ✓ NA
Are reports consistent with observations? ___Yes ___No ✓ NA

See Compliance Summary Report at the end of this report for a compliance determination

7. **Compliance Status:** There were no violations of air pollution rules or this company's permit conditions discovered during this inspection.

8. **Additional Comments:** None.

GENERAL SOURCE ISSUES:

1. **Does the permit accurately represent the emission units observed?** ____Yes ✓ No ____NA
   EU 5502-4 was exhausting to Stack 5502-3 which is not yet permitted.
2. **Have violations been documented by photographs** ____Yes ____No ✓ NA
3. **Were Pollution Prevention opportunities discussed?** ✓ Yes ____No ____NA
4. **Per the source, are they required to have a Risk Management Plan** ____Yes ✓ No ____NA

   If yes, does the source have a plan? ____Yes ____No

   Have the employees been trained? ____Yes ____No

5. **Has the source submitted an acceptable Annual Compliance Certification for the current applicable year?** ✓ Yes ____No ____NA

ADDITIONAL COMMENTS:

- **Emergency, Excess Emission and/or Deviation Reports** - See Compliance Summary Report following this report for available reports required by permit. No Emergency, Excess Emission and/or Deviation reports were submitted to OES from May 18, 2007 to April 25, 2008. All quarterly reports have been received and no violations noted in the Quarterly Deviation and Compliance Monitoring Report.
- **Annual Compliance Certification** - See Compliance Summary Report following this report for a complete review of the 2007 Annual Compliance Certification (ACC). The ACC for 2007 was received on April 14, 2008 and was reviewed on April 30, 2008. The due date was 04/15/07.
- **Annual Emission Statement** – National Starch and Chemical Company is required to submit ISTEPs for each year. The 2006 report, submitted on June 29, 2007, demonstrated that the emission units observed and those listed in the permit do match those found in ISTEPs. OES reviewed the ISTEPs report on August 31, 2007 to verify that the correct emission factors were used and that the control equipment was applied to the correct pollutants. There was one pollutant, Particulate Matter (PM), which differed more than ±10% and ±10 tons/year from 2005 to 2006. The PM increased 12.83% and 16.17 tons due to increased production. The 2007 emissions report is due July 1, 2008.
- **Permit Listing Information** - See Compliance Summary Report at the end of the report for a complete listing of permit information listed for National Starch and Chemical Company.
- **Permit Issues** – See below table for comments concerning the permit:

Emitting Unit (number)	Current Stack Designation	Source Comment (staff member)
Loose Feed Bins (5502-4)	5502-4	Exhausts to Stack 5502-3 (Jeff King)
Agglomerator Feed Storage Bin (5549-12)	5549-12	These all exhaust to the same stack (Roger Graves)
Agglomerator (5549-13)	5549-13	These all exhaust to the same stack (Roger Graves)
Agglomerator Equipment Aspiration (5549-14)	5549-14	These all exhaust to the same stack (Roger Graves)
Gluten Receiver (5503-1)	5503-1	This baghouse is known as the Gluten Dust Collector instead of "Baghouse"(Denise Curtis)
Spray Dryer Storage Bin #5 (5549-16)	5549-16	This was noted as an integral baghouse but why does it have a stack as observed during the inspection? (Roger Graves)
North Packer (5549-19)	5549-19	A descriptor of "North Packer, Line 1" could replace the current text.
Fugitive Dust Collector	5549-20	A descriptor of "Fugitive Dust Collector, Line 2" could

(5549-20)		replace the current text.
Line 1 Packing ambient D/C (5549-21)	5549-21	A descriptor of "Fugitive Dust Collector, Line 1, Bldg 851" could replace the current text.

- **Permit Fees** – The OES Planning group has verified that the permit fees have been paid for 2008. Payment was received on 01/31/08.
- **Emitting Units Operating** - During this inspection, thirty-five (35) of fifty-seven (57) significant emitting units were observed in operation. This is 60% of the significant emitting units.
- **Full Compliance Evaluation(FCE)** - This inspection meets the requirements of the Clean Air Act Stationary Source Compliance Monitoring Strategy (CMS) dated April 25, 2001. This inspection was a comprehensive evaluation of all regulated pollutants at all regulated emission units within this facility.

INSPECTION SUMMARY: There were no violations of air pollution rules or this company's permit conditions discovered during the on-site inspection and eleven (11) violations discovered during the records review covering the period of May 18, 2007 to April 25, 2008. See below.

1. Unit 5549-13 had a missing pressure drop on March 29, 2008 and Unit 577-2 had a missing pressure drop on September 6, 2007. On October 11, 2007 Unit 5503-2 exceeded the pressure drop range of 1-8" of water with a reading of zero (0) and the CRP was not implemented in any of the three cases. This totals two (2) pressure drop violations with regard to permit 097-24287-00042, D.2.7(a) & (b) and one (1) pressure drop violation of permit 097-24287-00042, D.2.7(c).

2. VE observations were stopped for EU 5502-4 (097-24287-00042, D.2.6(b)) because the unit was disconnected and routed to the Feed DC, Stack 5502-3, as of November 1, 2007. This connection to the dust collector exhausting to Stack 5502-3 is a change requested in the draft significant permit 097-23497-00042 and occurred prior to permit approval and is a potential violation.

3. On September 6, 2007 the VE notations were missing for 577-02, 577-05, 577-06, 577-07, 577-08, 577-09, and 577-10. These missing data were reported as deviations in the 3Q and ACC 2007 reports. This totals seven (7) missing VE violations of permit 097-24287-00042, D.2.6(b).

All eleven (11) violations were referred to OES Enforcement on May 1, 2008.

RECOMMENDATIONS: Reinspect next calendar year. Refer violations and potential violations to OES Enforcement. Refer permit issues to OES Permits.

EXIT INTERVIEW: Ms. Curtis was told about the missing records and the failure to implement a Compliance Response Plan on October 11, 2007 for the pressure drop below the permitted range of 1-8" of water.

ATTACHMENTS: Compliance Summary Report,
Compliance Agreement signed on January 18, 2008

cc: IDEM, Office of Air Quality

Compliance Summary Report

Plant ID: 00042 **Company Name:** National Starch and Chemical Company

Permit T

Inspector Derek R. Eisman **Date Range:** From 5/18/2007 to 4/25/2008

Compliance

Limit: (PM/PM10) 29,584,000 bushels per year, rolled on a monthly basis Rule Reference: 326 IAC 2-2

Emission Unit: Corn processing EUs: 5502-1A, 1B, 1D, 3, 4, 5, 6, 7, 5503-1, 2, 3, 4, & 5 Parameter: Combined Input of Corn Grind (bushels)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	21,459,997	Yes	Jun
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	21,392,269	Yes	Aug
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	21,469,553	Yes	Dec

Limit: 22,500 T of starch per year, rolled on a monthly basis Rule Reference: 326 IAC 2-2

Emission Unit: 5549-1 & 5549-2 (Spray Dryer #1 & #2) Parameter: Combined Input of Starch (tons)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	18,507	Yes	
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	19,490	Yes	
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	19,801	Yes	

Limit: 14,010 tons of starch per year, rolled on a monthly basis Rule Reference: 326 IAC 2-2

Emission Unit: 5549-13 (Agglomerator) Parameter: Input of starch (tons)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	2944	Yes	Jun
2007	Q3	10/30/2007	10/3/2007	Yes	Yes	3713	Yes	Sep
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	3912	Yes	Oct

Limit: (NOx) 1,851 MMcf Natural Gas used per 12 mos rolling total Rule Reference: 326 IAC 2-2

Emission Unit: 5502-1A, 5502-1B, 5502-1C & 5502-1D Parameter: Natural Gas use (MMcf)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	558	Yes	May
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	558	Yes	Aug
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	561	Yes	Nov & Dec

Limit: 123,300 Tons per 12 mos rolling Rule Reference: 326 IAC 6-1-12

Emission Unit: 575-2 (Starch Flash Dryer) Parameter: Amount of dry product processed (tons)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	66,653	Yes	Jun
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	68,121	Yes	Sep
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	69,358	Yes	Dec

Limit: 145,610 tons per 12 consecutive month period Rule Reference: 326 IAC 6-1-12

Emission Unit: 40-3 Parameter: Amount of starch produced (tons)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	69,671	Yes	Jun

2007	Q3	10/30/2007	10/30/2007	Yes	Yes	69,219	Yes	Aug
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	68,546	Yes	Oct

Limit: (VOC) 11,995,200 pounds per 12 consecutive month

Rule Reference: 326 IAC 8-1-6 not applicable

Emission Unit: 575-2 (Starch Flash Dryer)
Parameter: Methanol emitting corn starch & VOC reagent (lbs)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	0	YesProduct not made since 1999	
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	0	YesProduct not made since 1999	
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	0	YesProduct not made since 1999	

Limit: 5503-6 shall not operate more than 1,602 hours per 12 consecutive month

Rule Reference: 326 IAC 2-2 not applicable

Emission Unit: 5503-6

Parameter: Hours of Operation (hrs)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	567	Yes	Apr
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	541	Yes	Jul
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	483	Yes	Oct

Limit: Quarterly Deviation and Compliance Monitoring Report

Rule Reference:

Emission Unit: Entire Source

Parameter: Quarterly Deviation and Compliance Monitoring Rpt

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q2	7/30/2007	7/13/2007	Yes	Yes	No Deviations reported	Yes	
2007	Q3	10/30/2007	10/30/2007	Yes	Yes	8 Deviations reported	Yes	7 VEs were not taken for 577-2 & 577-5 to 577-10 and 1 PD not recorded on 577-2 (09/06/07)
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	No Deviations reported	Yes	10/11/07 Unit 5503-2 had pressure drop of 0.0 with no CRP implemented.

Limit: (PM/PM10) 29,584,000 bushels per year, rolled on a monthly basis

Rule Reference: 326 IAC 2-2, 326 IAC 6.5-1-2

Emission Unit: Corn grind EUs: 5502-1A, 1B, 1D, 3, 4, 5, 6, 7, 5503-1, 2, 3, 4, 5, & 6

Parameter: Combined Input of Corn Grind (bushels)

Year:	Period:	Date Due	Date Received	On Time	Certification	Reported Results	Compliance	Comments:
2007	Q4	1/30/2008	1/30/2008	Yes	Yes	21,469,553	Yes	Dec

Annual Compliance

Year	Date Received	Date Due	Date QA'd	Deviations	Certified Compliance	Date of Revision	Certification Accepted	Comments
2007	4/14/2008	4/15/2008	4/30/2008	Yes	Yes		Yes	For all violations from 2005 to 2007, an NOV was issued on 10/01/07. CA was signed on 01/18/08. Additional violations were referred to OES Enforcement on 04/30/08.

Malfunction or Emergency Occurrence Report - None Reported!

Permit Information

Permit Number	Date Received	Date Issued	Permit Description	Comments
097-20891-00042	3/1/2005	12/8/2006	Title V Significant Permit Modification	Replace SO2 scrubber for all EU 5502 with the 1st Effect Wash Water System.
097-23599-00042	3/1/2005	10/2/2006	Title V Minor Source Modification	Add (2) IAs: EU T-1: Starch Dryer & EU 5549-22: Line 1 South Packing Hopper
T097-7714-00042	12/13/1996	4/14/2004	Title V	
097-24287-00042	2/6/2007	8/23/2007	Title V Significant Permit Modification	Combine Truck Loadout and Hammer Mill into one emission point and remove monitoring and record keeping requirements

Stack Test Summary - No Stack Test Data Available

Emissions Report

Reporting Year: 2006 Reporting Interval: 1 Comments: PM emissions increased due to increased production.
Date Due: 7/1/2007 Report Certified: Yes
Date Received: 6/29/2007 On Time: Yes

Emissions in Tons:	PM	PM10	CO	Lead	NOx	SO2	VOC	SHAP	CHAP
	142.219	116.6987	29.27	0	67.68	11.4414	20.6	0	0
Percent Change:	12.83%	-7.42%	2.59%	No Data	2.84%	32.04%	-4.41%	No Data	No Data
Net Change in Tons:	16.17	-9.35	0.74	No Data	1.87	2.78	-0.95	No Data	No Data

STATE OF INDIANA	)	ADMINISTRATIVE ADJUDICATION
	) SS:	
COUNTY OF MARION	)	DOCKET NO. 07-A-0280
CITY OF INDIANAPOLIS,	)	
Plaintiff,	)	
vs.	)	
INDOPCO, INC. d/b/a NATIONAL STARCH AND CHEMICAL COMPANY,	)	
Defendant.	)	

COMPLIANCE AGREEMENT

Plaintiff is the City of Indianapolis, ("City") a body corporate and politic, acting through its Department of Public Works, Office of Environmental Services ("OES").

Defendant is INDOPCO, Inc. d/b/a National Starch and Chemical Company ("National Starch"), a corporation authorized to conduct business in the City of Indianapolis, Indiana.

The Notice of Violation in this cause was issued on or about January 6, 2006, and revised on October 1, 2007, alleging that National Starch violated Indianapolis Air Pollution Control Board Regulation 2 "Permits", Section 2-24(3). More specifically, National Starch was alleged to have failed to keep visible emission notation records, to implement the Compliance Response Plan, implement the Preventative Maintenance Plan, to document the scrubber circulation rate, to keep the baghouse pressure drop records, to operate the sulfur dioxide scrubber, and to operate the Regenerative Thermal Oxidizer.

In the Notice of Violation, the City further alleged the following:

Background Information:
On March 24, 1997, the City of Indianapolis Office of Environmental Services (City) issued Construction Permit number CP-09700042-01, to National Starch and Chemical Company (National Starch), located at 1515 South Drover Street, Indianapolis, Indiana, for the construction of the By-Products Rebuild (including EU 575-2 and EU 575-3).

On March 10, 2000, the City issued Minor Source Modification number 097-11764-0042 to National Starch and Chemical Company for the North Packing line (EU 577-2).

On August 30, 2000, the City issued Significant Source Modification number 097-11362-00042 to National Starch and Chemical Company for the Spray Agglomerator Process (including EU 5549-20 and 5549-21).

On April 14, 2004, the City issued Part 70 Operating Permit number T097-7714-00042 to National Starch. According to Sections C.15 and C.18 of the Part 70 Operating Permit, a Compliance Response Plan and recordkeeping for new permit requirements shall be prepared and implemented within ninety (90) days of permit issuance; therefore, the new requirements became effective on July 14, 2004. Additionally, on October 8, 2004, a Joint Motion and Stipulation for Stay were filed for Part 70 Operating Permit number T097-7714-00042. Both the new Part 70 Operating Permit requirements and the Joint Motion and Stipulation for Stay were taken into consideration in determining the violations included in this Notice of Violation.

On December 8, 2006, the City issued First Significant Permit Modification T097-20891-00042 to National Starch. The permit modification revised the allowable pressure drop ranges for the scrubbers in Section D.1.9.b. of Part 70 Operating Permit number T097-7714-00042 and revised the allowable pressure drop ranges for the baghouses in Section D.2.7.c. of T097-7714-00042. The First Significant Permit Modification also eliminated the scrubber used to control SO_2 emissions from units 5502-1A (Feed Dryer), 5502-1B (Germ Dryer), and 5502-1C (Gluten Dryer) with a first effect wash water system to control SO_2 emissions from unit 5502-1A only. A performance test conducted on January 11, 2006, demonstrated that the first effect wash water system controlled SO_2 emissions below the allowable limit.

On August 23, 2007, the City issued Significant Permit Modification SPM097-24287-00042 to combine two (2) emission points (Hammer Mil and the Truck Loadout) into one (1) emission point controlled by a common baghouse and exhausting to stack 5502-3. The Truck Loadout (identified as unit 5503-6) has been combined with the emissions from the Hammer Mill (identified as unit 5502-3) and both exhaust to stack 5502-3 and the requirements for collector for 5503-6 have been eliminated.

Evidence of Violations:
Based upon inspections conducted by the City on February 23, 2005, February 24, 2005, June 13, 2006, June 27, 2006, April 30, 2007, May 17, 2007, and May 18, 2007,and quarterly deviation and compliance monitoring reports from the second quarter 2004 through the fourth quarter 2006 submitted by National Starch to the City, the following violations are hereby noted:

Violations 1. - 15. (Failure to document visible emission notations for EU 575-3)
From April 11, 2004, through April 25, 2004, National Starch was unable to provide records of the daily visible emission notations from the wet scrubber EU 575-3 for the Number 6 Starch Flash Dryer. Pursuant to Construction Permit 9700042-01, Section 18, visible emission notations of the exhaust from stack EU 575-3 were required to be performed once per day.

National Starch failed to provide the daily record of the visible emission notations for EU 575-3 on fifteen (15) days.

Violations 16. - 20. (Failure to implement Compliance Response Plan for EU 40-2)
During the week of September 20, 2004, and the week of December 6, 2004, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

During the week of August 22, 2005, and the week of August 29, 2005, National Starch was below the allowable pressure drop requirement. The pressure drop was recorded to be less than six (6) inches of water from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

During the week of December 4, 2006, National Starch was below the allowable pressure drop requirement. The pressure drop was recorded to be less than six (6) inches of water from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on five (5) occasions during the weeks of September 20, 2004, December 6, 2004, August 22, 2005, August 29, 2005, and December 4, 2006.

Violations 21. - 23. (Failure to implement Compliance Response Plan for EU 40-4)
During the week of November 22, 2004, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 40-4 for the Number 1 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the

scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

During the week of August 22, 2005, and the week of August 29, 2005, National Starch was below the allowable pressure drop requirement. The pressure drop was recorded to be less than six (6) inches of water from the wet scrubber EU 40-4 for the Number 1 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on three (3) occasions during the weeks of November 22, 2004, August 22, 2005, and August 29, 2005.

Violation 24. (Failure to implement Preventative Maintenance Plan for EU 575-3)
During the week of June 7, 2004, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 575-3 for the Number 6 Starch Flash Dryer. Pursuant to Construction Permit 9700042-01, Section 17, the pressure drop across the scrubber is required to be monitored at least once per week. The Preventative Maintenance Plan for the scrubber is required to contain troubleshooting contingency and corrective actions for when the pressure drop readings are outside of the normal range for any one reading.

National Starch failed to implement the compliance response steps on one (1) occasion during the week of June 7, 2004.

Violation 25. (Failure to implement Compliance Response Plan for EU 575-3)
During the week of November 15, 2004, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 575-3 for the Number 6 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on one (1) occasion during the week of November 15, 2004.

Violation 26. (Failure to document scrubber circulation rate for EU 575-3)
During the week of December 19, 2005, National Starch failed to document the scrubber circulation rate for the wet scrubber EU 575-3 for the Number 6 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the scrubber recirculation rate for the scrubber is required to be monitored at least once per week.

National Starch failed to document the scrubber circulation rate on one (1) occasion during the week of December 19, 2005.

Violation 27. (Failure to implement Compliance Response Plan for EU 575-2)
During the week of October 25, 2004, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 575-2 for the Number 5 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on one (1) occasion during the week of October 25, 2004.

Violation 28. (Failure to implement Compliance Response Plan for EU 575-1)
During the week of July 19, 2004, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 575-1 for the Number 4 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on one (1) occasion during the week of July 19, 2004.

Violations 29. - 31. (Failure to implement Compliance Response Plan for EU 575-1, EU 575-3, and EU 40-2)
During the week of January 31, 2005, for EU 575-1, and EU 575-3, and the week of February 7, 2005, for EU 40-2, National Starch exceeded the allowable pressure drop requirement. The pressure drop was recorded to be greater than twelve (12) inches of water from the wet scrubber EU 575-1 for the Number 4 Starch Flash Dryer, from the wet scrubber EU 575-3 for the Number 6 Flash Dryer, and from the wet scrubber EU 40-2 for the Number 3 Starch Dryer . Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on three (3) occasions during the weeks of January 31, 2005, and February 7, 2005.

Violations 32. - 37. (Failure to document pressure drop for EU 40-4, EU 40-3, EU 40-2,

EU 575-1, EU 575-2, and EU 575-3)
During the week of October 4, 2004, National Starch failed to record the pressure drop for from the wet scrubber EU 40-4 for the Number 1 Starch Flash Dryer, from the wet scrubber EU 40-3 for the Number 2 Starch Flash Dryer, from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer, from the wet scrubber EU 575-1 for the Number 4 Starch Flash Dryer, from the wet scrubber EU 575-2 from the Number 5 Starch Flash Dryer, and from the wet scrubber EU 575-3 from the Number 6 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week.

National Starch failed to document compliance of the pressure drop requirement for six (6) wet scrubbers during the week of October 4, 2004.

Violations 38. – 55. (Failure to document visible emissions for EU 40-4, EU 40-3, EU 40-2, EU 575-1, EU 575-2, and EU 575-3)
On January 29, 2006, January 30, 2006, and May 22, 2006, National Starch failed to record the visible emission notations from the wet scrubber EU 40-4 for the Number 1 Starch Flash Dryer, from the wet scrubber EU 40-3 for the Number 2 Starch Flash Dryer, from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer, from the wet scrubber EU 575-1 for the Number 4 Starch Flash Dryer, from the wet scrubber EU 575-2 from the Number 5 Starch Flash Dryer, and from the wet scrubber EU 575-3 from the Number 6 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.7.a., visible emission notations of the exhaust stack are required to be performed once per day.

National Starch failed to document compliance of the visible emission notation requirement for six (6) wet scrubbers on January 29, 2006, January 30, 2006, and May 22, 2006, for a total of eighteen (18) occasions.

Violations 56. - 62. (Failure to document pressure drop for EU 40-4, EU 40-2, and EU 575-1)
During the week of March 14, 2005, for EU 575-1, and during the week of March 21, 2005, and the week of March 28, 2005, National Starch failed to record the pressure drop for from the wet scrubber EU 40-4 for the Number 1 Starch Flash Dryer, from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer, and from the wet scrubber EU 575-1 for the Number 4 Starch Flash Dryer from the Number 6 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week.

National Starch failed to document compliance of the pressure drop requirement on seven (7) occasions during the three-week periods between the week of March 14, 2005, through the week of March 28, 2005.

Violations 63. - 74. (Failure to implement Compliance Response Plan for EU 40-4, EU 40-2, and EU 575-1)
On April 25, 2005, May 2, 2005, May 16, 2005, and May 23, 2005, for EU 575-1, on April 4,

2005, April 11, 2005, April 18, 2005, and April 25, 2005, for EU 40-4 and EU 40-2, National Starch was below the allowable pressure drop requirement. The pressure drop was recorded to be less than six (6) inches of water from the wet scrubber EU 40-4 for the Number 1 Starch Flash Dryer, from the wet scrubber EU 40-2 for the Number 3 Starch Flash Dryer, and from the wet scrubber EU 575-1 for the Number 4 Starch Flash Dryer. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.8.b., the pressure drop across the scrubber is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 6.0 to 12.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps on twelve (12) occasions between April 4, 2005, and May 23, 2005.

Violations 75. - 179. (Failure to document visible emission notations for EU 577-2, EU 577-5 through EU 577-10)
From April 11, 2004, through April 25, 2004, National Starch was unable to provide records of the daily visible emission notations from the baghouse EU 577-2 for the RSP North Packing Line, from the baghouse EU 577-5 for the RSP Hopper number 4, from the baghouse EU 577-6 for the RSP Hopper number 6, from the baghouse EU577-7 for the RSP Hopper number 5, from the baghouse EU 577-8 for the RSP Hopper number 1, from the baghouse EU 577-9 for the RSP Hopper number 2, and from the baghouse EU 577-10 for the RSP Hopper number 3. Pursuant to Construction Permit 9700042-01, Section 18., visible emission notations of the exhaust from each of the seven (7) baghouses above was required to be performed once per day.

On May 22, 2006, National Starch was unable to provide records of the daily visible emission notations from the baghouse EU 577-2 for the RSP North Packing Line, from the baghouse EU 577-5 for the RSP Hopper number 4, from the baghouse EU 577-6 for the RSP Hopper number 6, from the baghouse EU577-7 for the RSP Hopper number 5, from the baghouse EU 577-8 for the RSP Hopper number 1, from the baghouse EU 577-9 for the RSP Hopper number 2, and from the baghouse EU 577-10 for the RSP Hopper number 3. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.6.b., the visible emission notations of the exhaust from each of the seven (7) baghouses above was required to be performed once per day.

National Starch failed to provide the daily record of the visible emission notations for EU 577-2, EU 577-5, EU 577-6, EU 577-7, EU 577-8, EU 577-9, and EU 577-10 on fifteen (15) days for a total of one hundred five (105) missing records.

Violations 180 - 291. (Failure to implement Compliance Response Plan for EU 577-2)
On thirty-one (31) days between April 27, 2004, and December 30, 2004, National Starch was below the allowable pressure drop requirement. The pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Sections D.2.7.b. and

D.2.7.c., the pressure drop across the scrubber is required to be monitored at least once per day. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

(Pursuant to Minor Source Modification number 097-11764-00042, Section D.1.6., National Starch was previously required to record daily the pressure drop across the baghouse and implement the Compliance Response Plan when out of range.)

On January 3, 2005, January 4, 2005, January 6, 2005, January 7, 2005, January 10, 2005, though January 12, 2005, January 15, 2005, January 22, 2005, January 31, 2005, February 4, 2005, February 7, 2005, February 9, 2005, February 11, 2005, February 13, 2005, February 14, 2005, February 17, 2005, through February 19, 2005, February 24, 2005, February 25, 2005, February 27, 2005, February 28, 2005, March 2, 2005, through March 8, 2005, March 10, 2005, through March 12, 2005, March 14, 2005, through March 16, 2005, and March 19, 2005, through March 31, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

From April 1, 2005, through April 5, 2005, April 7, 2005, through April 24, 2005, and April 26, 2005, through April 29, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

On November 13, 2006, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps for one hundred twelve (112) days between April 24, 2004, and November 13, 2006.

Violations 292. - 297. (Failure to implement Compliance Response Plan for EU 577-2)
From October 25, 2004, through October 30, 2004, National Starch exceeded the allowable

pressure drop requirement. The pressure drop was recorded to be greater than six (6) inches of water across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Sections D.2.7.b. and D.2.7.c., the pressure drop across the baghouse is required to be monitored at least once per week. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps from October 25, 2004, through October 30, 2004, on six (6) occasions.

Violations 298. - 436. (Failure to document total static pressure drop for EU 577-2)
From June 7, 2004, through July 13, 2004, National Starch failed to document the total static pressure drop for across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Minor Source Modification number 097-11764, Section D.1.8(b), the total static pressure drop across the National Starch was required to be monitored at least once per day while in operation.

National Starch failed to document compliance of the total static pressure drop requirement on thirty-six (36) days from June 7, 2004, through July 13, 2004.

From July 14, 2004, through October 24, 2004, National Starch failed to document the total static pressure drop for across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.b., the total static pressure drop across the baghouse is required to be monitored at least once per day while in operation.

On May 22, 2006, National Starch failed to document the total static pressure drop for across the baghouse EU 577-2 for the RSP North Packing Line. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be recorded at least once per day while in operation.
National Starch failed to document compliance of the total static pressure drop requirement on one hundred three (103) days between July 14, 2004, and May 22, 2006.

Violations 437. - 649. (Failure to implement Compliance Response Plan for EU 5549-13)
On various days from July 14, 2004, through February 20, 2005, National Starch exceeded the allowable total static pressure drop requirement. The total static pressure drop was recorded to be greater than six (6) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

On February 21, 2005, February 22, 2005, February 28, 2005, March 2, 2005, through March 4, 2005, March 28, 2005, and March 29, 2005, National Starch exceeded the allowable total

static pressure drop requirement. The total static pressure drop was recorded to be greater than six (6) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps for two hundred thirteen (213) days between July 14, 2004, and March 29, 2005.

Violations 650. - 693. (Failure to implement Compliance Response Plan for EU 5549-13)
On February 3, 2005, March 17, 2005, through March 23, 2005, March 25, 2005, and March 26, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

From April 4, 2005, through April 30, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

From December 26, 2005, through December 28, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

On March 9, 2006, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

On May 7, 2006, and from June 16, 2006, through June 18, 2006, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was

recorded to be less than three (3) inches of water across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps for forty-four (44) days between February 3, 2005, and June 18, 2006.

Violations 694. - 698. (Failure to document total static pressure drop for EU 5549-13)
On September 30, 2004, and December 11, 2004, National Starch failed to document the total static pressure drop for across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.a., the total static pressure drop across the scrubber is required to be monitored at least once per shift while in operation. However, the Joint Motion and Stipulation for Stay provided that the total static pressure drop for EU 5549-13 is required once per day. Pursuant to Part 70 Operating Permit T097-7715-00042, Section D.2.12.d., records of the visible emission notations must be maintained.

On March 27, 2005, December 25, 2005, and March 6, 2006, National Starch failed to document the total static pressure drop for across the baghouse EU 5549-13 for the Agglomerator. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.a., the total static pressure drop across the scrubber is required to be monitored at least once per shift while in operation. However, the Joint Motion and Stipulation for Stay provided that the total static pressure drop for EU 5549-13 is required once per day.

National Starch failed to document compliance of the total static pressure drop requirement on five (5) days on September 30, 2004, and March 6, 2006.

Violations 699. - 1037. (Failure to implement Compliance Response Plan for EU 5549-20)
From April 14, 2004, through February 20, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-20 for the Number 2 Fugitive Dust Collector. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

(Pursuant to Significant Source Modification number 097-11362-00042, Section D.1.6., National Starch was previously required to record daily the pressure drop across the baghouse and implement the Compliance Response Plan when out of range.)

From February 21, 2005, through March 31, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less

than three (3) inches of water across the baghouse EU 5549-20 for the Number 2 Fugitive Dust Collector. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

From April 1, 2005, through April 10, 2005, April 15, 2005, April 16, 2005, May 4, 2005, through May 8, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-20 for the Number 2 Fugitive Dust Collector. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

On July 2, 2006, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-20 for the Number 2 Fugitive Dust Collector. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps for three hundred thirty-eight (338) days between April 14, 2004, and July 2, 2006.

Violations 1038. - 1039. (Failure to document total static pressure drop for EU 5549-20)
On November 22, 2004, and November 23, 2004, National Starch failed to document the total static pressure drop for across the baghouse EU 5549-20 for the Number 2 Fugitive Dust Collector. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.b., the total static pressure drop across the baghouse is required to be monitored at least once per day while in operation.

National Starch failed to document compliance of the total static pressure drop requirement on two (2) days on November 22, 2004, and November 23, 2004.

Violations 1040. - 1203. (Failure to implement Compliance Response Plan for EU 5549-21)
On various days between April 27, 2004, and May 8, 2005, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5549-21 for the Line 1 Packing. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

(Pursuant to Significant Source Modification number 097-11362-00042, Section D.1.6., National Starch was previously required to record daily the pressure drop across the baghouse and implement the Compliance Response Plan when out of range.)

National Starch failed to implement the compliance response steps for one hundred sixty-four (164) days between April 27, 2004, and May 8, 2005.

Violations 1204. - 1205. (Failure to document total static pressure drop for EU 5549-21)
On November 22, 2004, and November 23, 2004, National Starch failed to document the total static pressure drop for across the baghouse EU 5549-21 for the Line 1 Packing. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.b., the total static pressure drop across the baghouse is required to be monitored at least once per day while in operation.

National Starch failed to document compliance of the total static pressure drop requirement on two (2) days on November 22, 2004, and November 23, 2004.

Violations 1206. - 1209. (Failure to Operate SO_2 Scrubber for EU 5502-1A, EU 5502-1B, and EU 5502-1C)
From July 23, 2004, through July 26, 2004, National Starch failed to operate the SO_2 scrubber as control for EU 5502-1A (Feed Dryer), EU 5502-1B (Germ Dryer), and EU 5502-1C (Gluten Dryer) while the processes were in operation. The SO_2 scrubber alarm was not operating while the process was operating. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.6., the scrubber shall be in operation and control particulate and SO_2 emissions from EU 5502-1A, EU 5502-1B, and EU 5502-1C at all times those units are operating.

National Starch failed to operate the SO_2 scrubber during four (4) days from July 23, 2004, through July 26, 2004.

Violations 1210. - 1212. (Failure to Operate SO_2 Scrubber for EU 5502-1A, EU 5502-1B, and EU 5502-1C)
From December 11, 2004, through December 13, 2004, National Starch failed to operate the SO_2 scrubber as control for EU 5502-1A (Feed Dryer), EU 5502-1B (Germ Dryer), and EU 5502-1C (Gluten Dryer) while the processes were in operation. The SO_2 scrubber alarm was not operating at the time due to maintenance performed earlier in the week on the scrubber nozzles. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.6., the scrubber shall be in operation and control particulate and SO_2 emissions from EU 5502-1A, EU 5502-1B, and EU 5502-1C at all times those units are operating.

National Starch failed to operate the SO_2 scrubber during three (3) days from December 11, 2004, through December 13, 2004.

Violations 1213. - 1339. (Failure to implement Compliance Response Plan for EU 5503-2) From January 1, 2005, through March 31, 2005, National Starch indicated in the quarterly deviation and compliance monitoring report for the first quarter of 2005 that National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5503-2 for the Germ Bin, Pellet Bin Number 1, Pellet Bin Number 2, and the Loadout Dust Collection System. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

From April 1, 2005, through May 1, 2005, National Starch indicated in the quarterly deviation and compliance monitoring report for the second quarter of 2005 that National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5503-2 for the Germ Bin, Pellet Bin Number 1, Pellet Bin Number 2, and the Loadout Dust Collection System. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

From November 13, 2006, through November 15, 2006, and November 17, 2006, through November 19, 2006, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5503-2 for the Germ Bin, Pellet Bin Number 1, Pellet Bin Number 2, and the Loadout Dust Collection System. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps for one hundred twenty-seven (127) days between January 1, 2005, and November 19, 2006.

Violations 1340. - 1349. (Failure to implement Compliance Response Plan for EU 5503-6) On August 21, 2006, August 24, 2006, September 10, 2006, and November 13, 2006, through November 19, 2006, National Starch was below the allowable total static pressure drop requirement. The total static pressure drop was recorded to be less than three (3) inches of water across the baghouse EU 5503-6 for the Truck Loadout Collector. Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.2.7.c., the total static pressure drop across the baghouse is required to be documented. When, for any one reading, the pressure drop is outside the range of 3.0 to 6.0 inches of water, the Compliance Response Plan is to be implemented.

National Starch failed to implement the compliance response steps for ten (10) days on

August 21, 2006, August 24, 2006, September 10, 2006, and November 13, 2006, through November 19, 2006.

Violations 1350. - 1357. (Failure to Operate Regenerative Thermal Oxidizer EU 5502-1D) From March 3, 2005, through March 9, 2005, National Starch failed to operate the Regenerative Thermal Oxidizer (EU 5502-1D) while the processes were in operation. The Regenerative Thermal Oxidizer (RTO) was taken off-line to repack the unit. Pursuant to Part 70 Operating Permit T097-7714-00042, Section C.5., all air pollution control equipment listed in the permit and used to comply with an applicable requirement shall be operated at all times that the emission units are vented to the control equipment are in operation.

Pursuant to Part 70 Operating Permit T097-7714-00042, Section D.1.1.c., the total particulate matter (PM)/particulate matter less than ten (10) microns in diameter (PM_{10}) emissions shall not exceed 0.0114 grains per dry standard cubic foot or 4.53 pounds per hour (lbs./hr.). National Starch indicated in the quarterly deviation and compliance monitoring report for the first quarter of 2005 that National Starch failed to comply with the allowable PM/PM_{10} limit on seven (7) days from March 3, 2005, through March 9, 2005. During this period, the estimated emissions were 25 lbs./hr. of additional particulate.

Indianapolis Air Pollution Control Board Regulation 2 "Permits", Section 2-24(3) states, in pertinent part, that "No person shall violate any condition of a permit to construct or a permit to operate. ..."

National Starch and Chemical Company is required to comply with Indianapolis Air Pollution Control Board Regulation 2 "Permits."

The parties agree that settlement of this Notice of Violations is in the public interest and consent to the entry of this Compliance Agreement, without further litigation, as the most appropriate means of resolving the issues raised herein. The parties agree that, pursuant to Section 103-501 through 513 of the Revised Code of the Consolidated City and County, an Administrative Hearing Officer has authority and jurisdiction to approve, modify and enforce this Compliance Agreement and to assess stipulated penalties, resolve disputes which arise under and take any action necessary or appropriate for the construction or implementation of this Compliance Agreement. Entry into this Compliance Agreement constitutes a full resolution of all enforcement issues or potential enforcement issues related to the Notice of Violation and City shall not hereafter bring any

enforcement action for the same alleged violations with the exception of any action necessary to enforce the terms of this Compliance Agreement. The parties agree to and shall be bound by the requirements of this Compliance Agreement.

NOW, THEREFORE, before the taking of any testimony, and without a hearing of any issue of fact or law and upon the consent of the parties, it is agreed by the parties and approved by the authorized Administrative Hearing Officer:

COMPLIANCE PROGRAM

1. National Starch agrees to comply with Chapter 511 of the Municipal Code of Indianapolis and Marion County, Indiana ("Chapter 511"), and with the Rules and Regulations of the Indianapolis Air Pollution Control Board ("the Regulations"), in all of its future operations.

GENERAL PROVISIONS

2. **Monetary Settlement.** This Compliance Agreement is in full settlement and satisfaction of all matters alleged in the Notice of Violation dated October 1, 2007. Entry into this Compliance Agreement does not constitute an admission of any violation. Entry into this Compliance Agreement constitutes a full resolution of all enforcement issues or potential enforcement issues related to the Notice of Violation and the City shall not hereafter bring any enforcement action for the same alleged violations with the exception of any action necessary to enforce the terms of this Compliance Agreement.

A. The payment of a civil penalty of Thirty-Four Thousand Eight Hundred Dollars ($34,800.00) shall be submitted by National Starch in the form of a check made payable to the **City of Indianapolis Office of Finance and Management** and delivered within thirty (30) days from the date of the Administrative Hearing Officer's approval of this Compliance Agreement to the following:

Enforcement Program Manager
City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

3. **Retention of Jurisdiction.** This Administrative Hearing Officer shall retain jurisdiction over this matter to modify or enforce the terms of this Compliance Agreement, including payment of Monetary Settlement, to assess stipulated penalties, to resolve disputes arising under the terms of this Compliance Agreement, or to take any action necessary or appropriate for construction or implementation of this Compliance Agreement.

4. **Effective Date.** This Compliance Agreement shall be effective upon the date that it is approved by the Administrative Hearing Officer.

5. **Satisfaction of Judgment.** This Compliance Agreement shall be deemed satisfied upon the completion and acceptance thereof by the City of each condition or obligation placed upon National Starch herein and upon payment by National Starch of all civil penalties as provided for in Section 2 hereof.

IT SO ORDERED THIS 18th day of January, 2008

Trina L. Saunders
ADMINISTRATIVE HEARING OFFICER
Authorized by Section 103-03 of the
Revised Code of the Consolidated City and County

FOR PLAINTIFF
City of Indianapolis

By: _____ Dated: 2-4-08

Stephanie A. Roth
Assistant Corporation Counsel
200 East Washington Street
1601 City-County Building
Indianapolis, Indiana 46204

FOR DEFENDANT
INDOPCO, Inc.
d/b/a National Starch and Chemical Company

By: _____ Dated: 12/20/07

Signature

RONALD J. MCCLIMMONS

Printed Name

SENIOR DIRECTOR INDIANAPOLIS SITE & DIVISIONAL OPERATIONS

Title

Copies to:

Ms. Cheryl Carlson
Enforcement Program Manager
Office of Environmental Services
City of Indianapolis
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Ms. Stephanie A. Roth
Assistant Corporation Counsel
City of Indianapolis
200 East Washington Street
1601 City-County Building
Indianapolis, Indiana 46204

Mr. Ronald McCrimmond
Director of Manufacturing
INDOPCO, Inc.
d/b/a National Starch and Chemical Company
P.O. Box 1084
1515 South Drover Street
Indianapolis, Indiana 46206